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ABSTRACT

Presented are nine papers on the issues and directions presented at meetings on the implementation of Public Law 94-142 (Education for All Handicapped Children Act) through the preparation of professionals in special education. Entries include the following titles and authors: "Regional Collaboration" by J. Harvey; "The Education for All Handicapped Children Act of 1975--Public Law 94-142 Regulations" by T. Irvin; "Cooperative Manpower Planning" by R. Schofer; "Inservice Programing and Preservice Priorities" by J. Siantz and E. Moore; "Innovation and Evaluation in Personnel Preparation" by P. Burke; "Dissemination" by G. Adamson and J. Smith; "Current Procedures and Issues in Grant Administration" by H. Saettler; "Responses from the Profession" by J. Gilmore, et al.; and "Conclusion--Partnership for Change" by J. Harvey, et al. (SBH)

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Personnel Preparation and Public Law 94-142

THE MAP, THE MISSION AND THE MANDATE

SECOND ANNUAL
REGIONAL CONFERENCES

Division of Personnel Preparation
Bureau of Education for the Handicapped
U. S. Office of Education

A REPORT

Edited by
JUDY SMITH
University of New Mexico

1977

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PREFACE

In September 1977, the Division of Personnel Preparation, Bureau of Education for the Handicapped, sponsored three regional conferences for the directors of its funded projects: in the District of Columbia on September 8 and 9, in St. Louis on September 13 and 14, and in Denver on September 16 and 17. Each conference had an identical agenda, intended to clarify concerns, directions, and priorities in the training of special education personnel on a national and regional basis.

At each meeting, the Division Director, Branch Chiefs, Project Officers, and professionals from the field acted as session leaders. Their presentations were, in turn, answered by three-member panels of attendees who summarized the reactions and questions of the regional audiences.

This book is a distillation of the issues and directions presented at these meetings. In an effort to consolidate topics in an orderly manner, occasional remarks by one speaker have been transferred to the chapter of a different speaker. The chapters represent major conference addresses, which converge on the implementation of Public Law 94-142 through the preparation of professionals in special education.

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FOREWORD

EDWIN W. MARTIN
Deputy Commissioner of Education and Director
Bureau of Education for the Handicapped
U. S. Office of Education

FOR THOSE of us involved in special education, this may appear to be both the best of times and the worst of times: the best in terms of the many forms of support and encouragement we are experiencing; the worst in terms of the various changes and crises that occur as we struggle to make Public Law 94-142 a practical reality.

Things are going very well in the sense that the new administration has very positive attitudes toward programming for and education of the handicapped. On several occasions, I have had the opportunity of working with Secretary Califano, particularly when we were developing the regulations for Section 504 of the Rehabilitation Act, and I have found him to be all of the things you may have observed—energetic, sharp, a very quick study, and a person who has a passionate commitment to human beings and to moving programs and making them more responsive. In each instance of decision making on whether to move forward or backward in budgeting, the Secretary has gone forward to the Office of Management and Budget and to the President, has asked for additional funds, and has been successful. With this kind of leadership, the feeling that many of us have is that we need to reawaken our sense of commitment and re-establish what we are trying to do in an agency that deals with human services.

Equally reassuring, Ernest Boyer, who was Chancellor for Higher Education in New York State before he became U. S. Commissioner of Education, also earned a doctorate and did post-doctoral work in speech and hearing at the University of Iowa. He therefore has an original commitment to working for the interests of disabled people, and has been a very interested, supportive, and knowledgeable advocate for our objectives. We are in an era in which the Commissioner can say, as he has, that one of his major concerns is programming for the handicapped and for disadvantaged youngsters, under the basic equal education opportunity theme. For those of us who have worked hard together over the years, this represents considerable positive movement.

Another step forward has been made with Public Law 94-142, although its implementation is highly controversial, and I imagine that you can see the problems more clearly than I can from this vantage point. However, we have gone out of our way to talk with people about their feelings and concerns, both in terms of developing the regulations (which Tom Irvin, Dan Ringelheim, and many others on our staff did very sensibly and very well), and in terms of devising an operating philosophy that would enable us to be understanding of the problems that state and local administrators are having. At the same time, we have been trying to work out solutions within the framework of the law.

The Bureau of Education for the Handicapped testified, and I think correctly, that we did not want amendments to the Education of All Handicapped Children Act at this time. Some amendments, I am sure, would be meritorious; there is no bill passed by the Congress that is not amended somewhere along the line and, in many instances, improved. But it is too early to do that now. The anxiety that people feel when a new public law is passed might result in over-reaction that would, for example, delay the date when services should be available to children or weaken the protections in some other way—because these are the things that create the most anxiety. I think we are realistic enough, and the Congress is certainly realistic enough, to understand that everything will not happen in ideal circumstances, with 100-percent effectiveness, all of the time. Nevertheless, it is terribly important that we have, as the basis

of our operation, a commitment on the part of state agencies to do what is required. In the past few years, we have been moving through a period of partial commitment or partial official policy. We want to move past that posture. To do so, it is very important that we do not retreat now. In order to participate in the Education for All Handicapped Children Act, a state must say, once and for all: *this is officially our policy; we will do this.* Subsequently, as we negotiate about problems or failures, we will do so with the permanent commitment of trying to respond.

I am sure that we will find many situations that are less than perfect. You will bring them to our attention, parent groups will bring them to our attention, and other advocate groups will report them. There will be problems, things will not always work properly, and remedial actions will be necessary—and then some of the remedial actions will not be accomplished as soon or as well as they should. There will be give and take. It is our job to make sure that none of the problems, insofar as we can determine, is based on subterfuge or on an unwillingness of a government agency to do the job. As long as all of our efforts are in good faith, with a sense of responsibility for resolving problems, I think we can reconcile the issues.

There are still people who feel strongly to the contrary. Recently a representative of a national organization that administers education indicated that his group would like at least partial relief from the requirements of the law. Others would like to make their compliance contingent on the availability of more dollars. Still others would like to remove some of the specific requirements in the due process section. At least one state education agency staff read the law incorrectly and, as a result, thought they had a year more to develop individualized educational programs than they actually have, and so they have requested a waiver. These are not the sorts of changes we are going to support right now. If people are moving heaven and earth to implement the law, I believe that a good faith response will be recognized, as opposed to a response that people intend to fight until the last minute to avoid implementing these programs and requirements.

Basically, we are operating on the basis of three points:

- The Act will be implemented.
- There will be a certain amount of muddling through, which is better than the alternative of having no firm dates or clearcut tasks.
- We want to commit ourselves as a professional group to working flexibly and cooperatively to solve the problems, but we will not retreat from the principle that every youngster must be a part of an educational program.

The Bureau of Education for the Handicapped is not interested in confrontations that would lead to the discontinuation of funds; we would do that only as a last resort. We are, however, interested in the principle that children are not going to be turned away from programs; that the programs are going to make sense; and that, when a child is identified and is not in a program, school personnel can make an affirmative response that will enable parents to sit down with them and solve the problem. Within these principles, I think there can be latitude. Next year's programs may be better than this year's, or may be more intensive, or may include more supportive services. We will not move from zero to 100 percent effectiveness in one step. Thus, I want you to feel free to write to me about issues that you find are of great concern, things you feel we ought to hear. We are very much interested in continuing the process of dialogue, and we will probably have meetings over the coming year or so, at different locations in the country, to talk about the issues of implementing 94-142.

Certainly one of the larger recurring issues is the generalized attitude that these things cannot really be done effectively, that all of these children cannot be served, that children cannot be placed in least restrictive environments because teachers are ill prepared. Some of the greatest alarm has been expressed by teachers' organizations. We are trying to work with these organizations and involve them in the teacher training business to some extent, so that they may find ways to help meet the needs of teachers, rather than simply expressing cautions.

Those of you who are already in the training business are going to be under pressure to stretch your capacities to all of the situations where new training will be necessary and to solutions of local problems as they arise. For example, parents and others may challenge the services that youngsters receive, or may charge that a teaching staff is insufficiently trained. The school district may, as a consequence, become the subject of an order from the Office of Civil Rights, or from our office, to provide inservice training as an immediate response to the situation. They will turn to you for help, even though that is often the most awkward method of

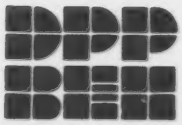
entering into collaboration. I hope you, as trainers of professionals, will do everything you can to assist in such situations, using all of your resources to help programs succeed. The longer we can see that kind of cooperation, the easier it will be for us to try to keep financial resources flowing to accomplish our goals for handicapped children.

I want you to know that I am aware of the pressures that federal policies have placed upon many of you. I know for a fact that your funds are being reduced and that you are being forced to reorient your own priorities and programs in ways that will match the categories in which we now have money. It would be simpler for us, and certainly a lot simpler for you, if we could give you the money with no strings attached and let you use your own sense of priorities. I do not think your programs would be any the worse for it, in the long run, because I would trust your priorities. But the fact is that we must have a sense of targeting, a sense of priorities, a sense of accountability—if we are to convince the Congress, the Government Accounting Office, the Office of Management and Budget, and others waiting impatiently in the wings that we are putting these dollars where they should go. I support that, too, and we have been partly responsible for developing that strategy. However, the change to these new formats can be an awkward transition. Some arbitrary decisions have to be made, some good things are sacrificed in the name of other good things, and a certain amount of game playing goes on. We understand that, but we are not encouraging it. We would like to see every dollar spent for the activity of highest priority.

I thank you for understanding these things. As a group representing training institutions, you have done many things well over the years. You were tremendously responsive in the old days when we moved out money for retardation, for speech disorders, and for other areas through different kinds of grants. You have supported the priorities as they were established, in early childhood education and in the education of the severely handicapped—even though these were a departure from the kinds of things you had been doing, even though it was not convenient. Now that we are trying to meet these new priorities, you are helping in good spirits and with good will. Because of these things, and because of the quality and dedication you have brought to the work of preparing professionals, I hope we will be working together for a long time to come.

Personnel Preparation and Public Law 94-142

THE MAP, THE MISSION AND THE MANDATE



Division of Personnel Preparation
Bureau of Education for the Handicapped

REGIONAL COLLABORATION

JASPER HARVEY
Director
Division of Personnel Preparation
Bureau of Education for the Handicapped

THE DIVISION of Personnel Preparation has pledged to see that the mandates of Public Law 94-142 are accomplished—and accomplished well. We want to carry out that promise through you, professional trainers who represent various areas of the United States, by means of the major effort in personnel preparation that is necessary to implement the law.

We want to support complementary programs and develop greater insights into quality and long-term collaborative planning.

Toward that end, we have convened three regional meetings of project directors funded by this Division. One of our purposes in these meetings has been to clarify the kinds of proposal writing and responding to priorities that will be important to you now and in the future. A second purpose has been to bring attention to some of the problems the entire country faces in terms of the requirements that must be met. A third purpose is to focus on essential tasks that will help to create the solutions we seek. An additional objective is to introduce and explain to you the reorganization of this Division into branches that represent three geographical regions of the nation (Figure 1), and the creation of a Program Review Staff intended to provide technical support to our branches and to you who offer proposals.

The Division and its staff will remain in the same location in Washington, D. C., and the functions of grant administration will remain essentially the same. In serving groups of contiguous states, however, branches and individual project officers will gain the ability to assist regions, rather than isolated states or projects, in developing substantive programs for the continuing supply of well trained personnel. We are also working in liaison with the Division of Assistance to States so that correlation may be achieved between training as addressed in state plans and as addressed in personnel preparation grants. As a result of these shifts, we as a Division will have greater capacities to fund programs that complement one another in the development of regional training bases, and we will also gain greater insights into the quality and long-term collaborative efforts that should be a fundamental part of our efforts.

Regional branches have been established for planning and problem-solving specific to geographical areas.

The Eastern Region Branch (Table 1) administers funding to programs in the District of Columbia, Puerto Rico, the Virgin Islands, and sixteen states: Connecticut, Delaware, Indiana, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, and West Virginia. These states do not, of course, comprise the entire east coast, and, compared with other geographical areas, they represent less than one-fourth of our total land mass. However, this particular area includes a group of very heavily populated states, whose programs have

traditionally been able to stand alone and attract large numbers of students, thus tending to fill personnel requirements in their immediate areas. These states also contain several of our larger and almost interlocking metropolitan areas, with their particular needs and difficulties. Moreover, although this region covers a relatively small area, we are currently supporting 227 projects within it—and this is just about one-third of our total commitment of 656 program assistance grants.

The Central Region Branch (Table 2), on the other hand, covers a territory much larger than that of the eastern region but serves fifteen states: Alabama, Arkansas, Florida, Georgia, Illinois, Iowa, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, North Carolina, South Carolina, Tennessee, and Wisconsin. This area contains fewer of the tremendous population centers per square mile and also covers large expanses of rural land. Thus, its goals and concerns would appear different from those of New York and New Jersey, for example. Within this region, we are funding 213 projects.

When we come to the Western Region and Special Projects Branch (Table 3), we find an immense geographical terrain that includes American Samoa, Guam, the Trust Territories, and nineteen states: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, and Wyoming. Much of this region is sparsely populated, and many of its communities are small and remote. Therefore, manpower needs here are dramatically different from those of other states. In this vast western region, we are underwriting 216 projects. (This branch also administers 58 Special Project grants, which are discussed in chapter 5.)

From a very practical viewpoint, we had to divide our workload equitably among our project officers, and this is another thing that the reorganization has accomplished. Our people need opportunities to do their best professional work, and some changes were in order so that such opportunities could be multiplied, even though we are seriously understaffed. For example, in 1970 the Division of Personnel Preparation administered $17.5 million, while in 1977 we are administering $45 million—with ten fewer staff members than we had seven years ago.

One by-product of technical review will be data-gathering.

Another step we have taken to equalize the burden and to ensure our project officers more time and increasing avenues to act in their professional capacities is the establishment of the Program Review Staff (Table 4), composed of technical specialists who formerly functioned throughout the Division. This group will carry out overviews and assessments of proposals as they are received, from a technical rather than a programmatic viewpoint, so that our staff may be assured of the intactness of each proposal prior to review by project officers and field readers. Over time, this staff will also carry out a number of data-gathering functions that will provide timely information to the Division, to you, to the Congress, and to our other constituencies. (The staff of the Office of the Director, shown on Table 5, completes the personnel roster.)

Funds are directed toward highly competitive thrust-relevant proposals, on a discretionary basis.

Our own internal operation was not the only reason, nor was it the primary reason, for the Division's reorganization. The most basic factor behind this change is the growing need to plan and work together to attend to regional problems that arise in implementing Public Law 94-142, and to address national priorities judiciously as they translate to a regional basis.

We cannot afford to disburse the kind of money that would allow parallel programs to be set up in each state. For fiscal year 1978, we will be disbursing $45,375,000, which is essentially the same budget we had for fiscal 1976 and fiscal 1977. When an 8 percent inflation factor is added, we are clearly administering less, not more, with each succeeding year.

Our funding is based on twelve priority areas (Table 6). Of these, each region has its own greatest needs which must be filled by a concerted effort within the region. This cannot be done on a state-by-state basis, nor can it be done by funding core programs and providing financial cushions to large state universities. We cannot keep that kind of money coming. This is a discretionary grant program, not a formula-based operation. We are dealing with thrust-relevant proposals on a discretionary basis, and the monies are *highly* competitive.

The mission of the Division of Personnel Preparation has several implications.

The monies will, in fact, be allocated on the basis of broad-based, comprehensive regional programming that will clearly make Public Law 94-142 a practical reality across the nation. The mission statement of this Division reflects just how serious we are in this regard:

> The thrust of the Division of Personnel Preparation is to provide professional, technical, and financial assistance to various institutions for the purpose of preparing qualified educators and other appropriate personnel in sufficient numbers in order to assure that the purpose of Public Law 94-142—that all handicapped children have available to them a free, appropriate public education in the least restrictive environment, which emphasizes special education and related services designed to meet their unique needs—may be implemented. The Division of Personnel Preparation reviews thrust-relevant proposals and administers grants awarded to institutions of higher education, state education agencies, local education agencies, and other nonprofit agencies on the basis of applications judged to merit funding by panels of competent professionals.[1]

That statement holds a number of implications. We are extremely concerned with the training of personnel to deal with the severely impaired. Although this is a low-incidence population, it is also an extremely difficult group in terms of teaching. As of today, there are only a handful of training programs that are truly focusing on severely and profoundly handicapped youngsters. Also seriously lacking are programs to prepare graduate students to work with the visually handicapped. We must work together to provide personnel to serve these children—uniformly, and in even the most remote areas.

Considering our budget, we must also be most concerned with quality and cost-effectiveness, as evidenced by program evaluation data that prove that our programs work and thus merit funding. Moreover, to work regionally, to pool our resources, to develop complementary programs, we must be involved in manpower planning and in dissemination. We further need to create effective inservice training programs for general and special educators so that they will be able to do the jobs that lie ahead of them in their classrooms and communities. Finally, every time we talk about special education, we talk about related services—professionals from other disciplines, as well as paraprofessionals, volunteers, and parents. These are crucial groups of people for whom we should provide substantial training.

A map is not a territory.

Our 1977 regional meetings, and the remainder of this book, have been planned to clarify not only the process of grant awards, but also to introduce some guidelines for the tasks to which we must all address ourselves. These guidelines come not only from the Division of Personnel Preparation, but also from groups of professionals from the field whom we have invited to advise us during the past eighteen months, and from those who attended the regional meetings.

The areas we are now organized to serve are, in a sense, states on the map—but "a map is not a territory."[2] In a greater sense, then, these areas are individually defined territories with their own lists of priorities and their unique ideas and problems. As a Division, we wish to use our budget for the incorporation of these factors in regional planning. As professionals, we look to this kind of planning as the best possible way to achieve our national goals.

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[1] Bureau of Education for the Handicapped. Planning document (unpublished draft), 1977.

[2] Hayakawa, S. I. Language in thought and action. New York: Harcourt, Brace, and World, Inc., 1964.

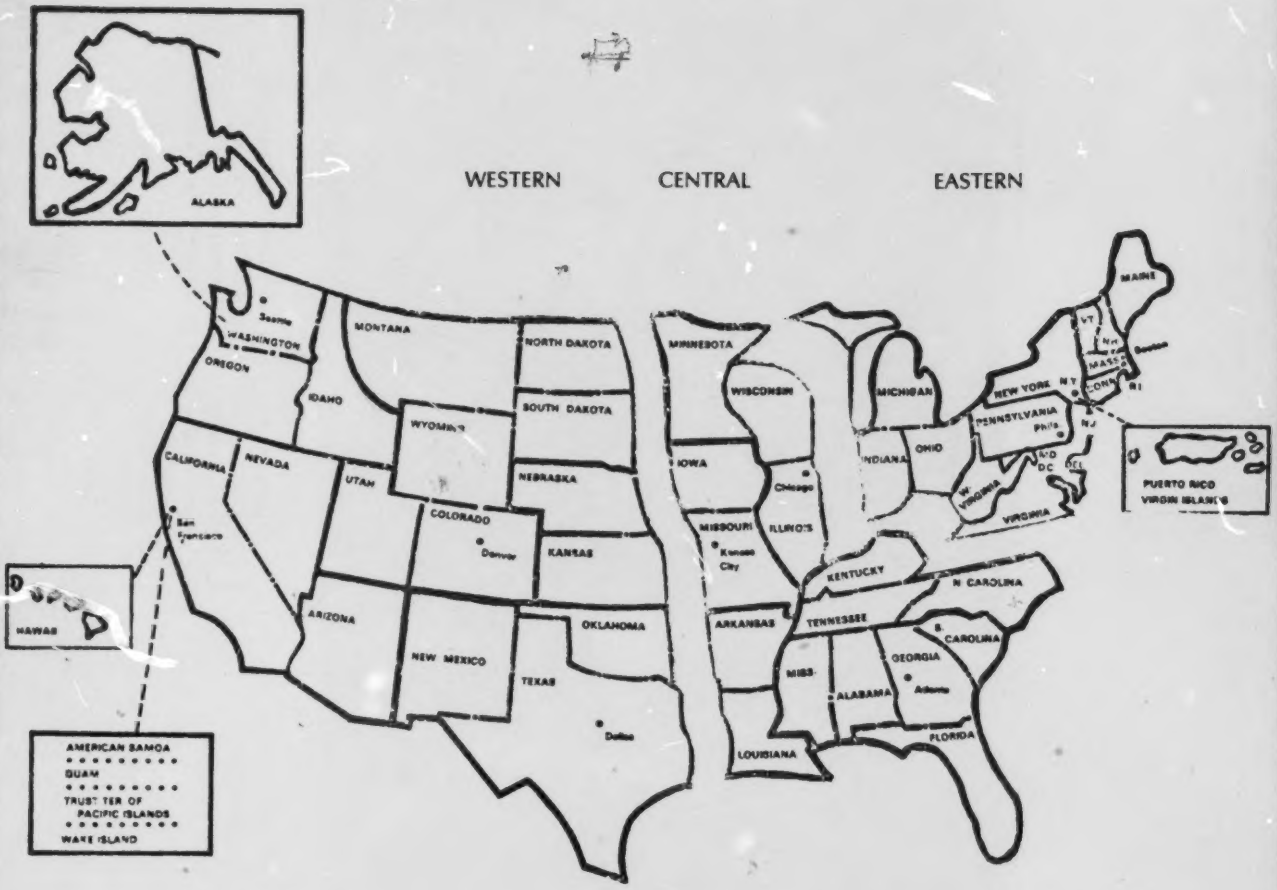

Figure 1. Areas served by branches of the Division of Personnel Preparation.

TABLE 1
Eastern Region Branch
Division of Personnel Preparation

	Personnel	*Assigned States*	*Assigned Program Areas*
	HERMAN SAETTLER Branch Chief (202) 245-9736	West Virginia Indiana Pennsylvania Virginia	
	WARREN AARONSON Project Officer (202) 245-9736	Delaware	University-Affiliated Facilities
	THOMAS BEHRENS Project Officer (202) 245-9736	Michigan New York Puerto Rico Virgin Islands	Deaf/Hard of Hearing Regular Education Preservice Severely Handicapped Learning Disabilities Caribbean Area
	MARYANN McDERMOTT Education Program Specialist (202) 245-9431		
	CHARLES MORGAN Project Officer (202) 245-9736	Dist of Columbia Maryland Ohio	Orthopedically Impaired Other Health Impaired Vocational Rehabilitation
	JOSEPHINE TAYLOR Project Officer (202) 245-9736	Connecticut Maine Massachusetts New Hampshire New Jersey Rhode Island Vermont	Visually Handicapped Multihandicapped Preschool Severely Handicapped

VICTORIA WARE
Education
Technician
245-9736

FRANCINE LUCKEY
Clerk-Typist
(202) 245-9736

STEPHANIE SMITH
Clerk-Dictaphone
Transcriber
(202) 245-9736

TABLE 2
Central Region Branch
Division of Personnel Preparation

	Personnel	*Assigned States*	*Assigned Program Areas*
	PAUL ACKERMAN Branch Chief (202) 245-9549	Illinois Minnesota Wisconsin	Native Americans Research Needs in Training Music Education/Therapy for the Handicapped Training Model Replication Early Childhood
	BETTY BAKER Project Officer (202) 245-9549	Arkansas Louisiana Mississippi Tennessee	
	SARA CONLON Project Officer (202) 245-2326	Alabama Florida Georgia South Carolina	Senior Advocate for Speech and Hearing Severely Handicapped State Education Agencies
	WILLIAM HILLMAN Project Officer (202) 245-9736	Iowa Kentucky Missouri North Carolina	Physical Education Recreation Arts for the Handicapped

ROSE SAYER
Staff Secretary
(202) 245-9549

TABLE 3
Western Region and Special Projects Branch
Division of Personnel Preparation

	Personnel	*Assigned States*	*Assigned Program Areas*
	PHILIP J. BURKE Branch Chief (202) 245-9431	Alaska	Special Projects Special Education Administration Severely Handicapped Mental Retardation
	MARTHA B. BOKEE Project Officer (202) 245-2326	Idaho Montana Nebraska North Dakota South Dakota Wyoming	Career/Vocational Education
	GWENETH BLACKLOCK BROWN Project Officer (202) 245-9431	American Samoa Arizona California Guam Hawaii Trust Territories	Emotionally Disturbed Volunteers (including Parents) Pacific Territories
	EDWARD MOORE Project Officer (202) 245-9431	Kansas Oklahoma Oregon Washington	Regular Education Inservice Paraprofessionals Minority Concerns
	WILLIAM PETERSON Project Officer (202) 245-2326	Colorado New Mexico Utah	Special Projects School Finance School Law
	JAMES SIANTZ Project Officer (202) 245-2326	Nevada Texas	Regular Education Inservice Interdisciplinary Training

BARBARA MILLINGTON
Branch Secretary
245-9549

BETTY MASON
Administrative Support Assistant
(202) 245-9431

TABLE 4
Program Review Staff
Division of Personnel Preparation

CONSTANCE TYNES
Chief, Program Review Staff
(202) 245-9736

CATHERINE DeLUCA
Education Technician
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EDITH SPRUILL
Education Program Specialist
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AGATHA ADAMS
Administrative Support Assistant
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LAVERNE CHAMBERS
Administrative Support Assistant
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MARTINI WRIGHT
Clerk-Typist
(202) 245-2727

TABLE 5
Staff, Office of the Director
Division of Personnel Preparation

DOROTHY JACKMAN
Secretary
(202) 245-9886

LUCY SPEARS
Clerk-Typist
(202) 245-2676

TABLE 6
Projected Fiscal 1978 Funds Distribution According to Priorities
Division of Personnel Preparation

	Pre-Service Amount	*In-Service Amount*	*Total Amount*
Preparation of Special Educators			
Early Childhood	3,732,000	2,488,000	6,220,000
Severely Handicapped	5,931,000	3,500,000	9,431,000
Paraprofessional	814,000	600,000	1,414,000
Physical Education	678,000	350,000	1,028,000
Recreation	618,000	300,000	918,000
Interdisciplinary	522,000	250,000	772,000
General Special Ed.	5,082,000	3,138,000	8,220,000
Vocational/Career Education	1,200,000	500,000	1,700,000
Subtotal	18,577,000	11,126,000	29,703,000
*Special Education Training for Regular Education Teachers**			
Instructional Models	3,420,000	6,500,000	9,920,000
Developmental Assistance	—	600,000	600,000
Model Implementation	2,130,000	2,357,000	4,487,000
Volunteer Program	266,000	399,000	665,000
Subtotal	2,396,000	3,356,000	5,752,000
Total	24,393,000	20,982,000	45,375,000

* Direct financial assistance related to the pre-service training of regular classroom teachers is not provided. Regular classroom teachers receiving in-service training are allowed up to $15 per diem when training is held at a site away from school.

THE EDUCATION FOR ALL HANDICAPPED CHILDREN ACT OF 1975: PUBLIC LAW 94-142 REGULATIONS

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SINCE ITS enactment on November 19, 1975, Public Law 94-142 has received tremendous attention—both positive and negative—from all quarters of the educational community. Whatever one may feel about the law, it is clear that its provisions will have a far-reaching effect on every handicapped child in the nation; on all state and local education agencies and other public agencies and institutions involved in the education of handicapped children; and on nearly 800 institutions of higher education that are engaged in training special education personnel.

Public Law 94-142 is not discrete unto itself but, rather, provides extensive amendments to Part B of the Education of the Handicapped Act.

The law is not discrete unto itself but, rather, provides extensive amendments to Part B of the Education of the Handicapped Act. (Part B is a formula grant program that provides financial aid to state and local education agencies to assist them in the education of handicapped children.) In spite of the attention it has received, most of the provisions in the law are not new. Such requirements as due process, child find, least restrictive environment, non-discriminatory testing, and others, were first passed under Public Law 93-380 (The Education Amendments of 1974) and subsequently incorporated into Public Law 94-142. In some cases, the provisions were incorporated verbatim; in others, they were greatly expanded.

The Bureau of Education for the Handicapped carried out a massive effort to obtain comments and suggestions for the development of the regulations for Public Law 94-142.

Before the proposed regulations were drafted, the Bureau of Education for the Handicapped carried out a massive effort to obtain comments and suggestions for their development from interested parties throughout the United States. In this effort, Bureau personnel met with nearly 2200 people and received several hundred written comments and recommendations. Next, a 170-member writing team (composed of parents, advocates, and representatives of educational agencies and special interest groups) was convened to prepare concept papers on major topics in the law. These papers formed the basis of the proposed rules, which were published on December 30, 1976.

During the 60-day public comment period that followed publication of the proposed regulations, the Bureau conducted six public hearings involving nearly 1000 people, and received over 1600 letters. A very large number of comments dealt not with the regulations themselves, but with statutory issues (problems in meeting the timelines for free appropriate public education, concerns about federal priorities that are not consistent with state and local priorities, and similar issues). A second large body of responses centered on specific issues related to the content of the proposed rules. Because so many comments were received, a number of individual concerns were consolidated,

and a substantial number of changes were made on the basis of these comments and concerns. Few of these changes, however, resulted in the addition of major substantive requirements. Most of the changes were technical or were made in order to provide greater clarity or to add explanatory detail. The remainder of this chapter will present an overview of the regulations in final form, as published on August 23, 1977.[3] (Subparts relating most closely to personnel preparations will be presented in greater depth than will other subparts.)

Subpart A. General Introduction

Subpart A: General. Subpart A includes definitions of statutory terms (e.g., free appropriate public education, special education, related services) and other terms used throughout the regulations. Hundreds of comments pertained to the definitions, particularly those concerned with the various handicapping conditions listed in the law. Where appropriate, recommended changes were incorporated, and other revisions were made to clarify the definitions. Moreover, definitions of deaf-blind and multi-handicapped were added to the general description of handicapped children.

The definition of related services was expanded to include school health services, and revisions were made in the definitions of individual terms pertaining to related services (e.g., psychological services, occupational therapy, and so on) in answer to recommendations by professional associations. Following the definition of related services, a comment was added to make clear (a) that the list of related services is not exhaustive, (b) that all services may not be required by every handicapped child, and (c) that the regulations define services to be provided, not service providers.

The regulations define services to be provided, not providers of services.

Subpart A also sets forth the purpose and applicability of the regulations. These requirements apply to each state that receives a Part B grant and to every public agency in the state that is involved in the education of handicapped children.

Although Part B, as amended by Public Law 94-142, is not a civil rights act, many of its provisions are regarded as basic rights of handicapped children (for example, the right to be educated, the right to due process) that have been reiterated in a series of court rulings over the past five years. Moreover, Part B is closely linked with Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112). Section 504 is a civil rights law which provides that:

Public Law 94-142 is linked closely with Section 504 of the Rehabilitation Act of 1973.

> No otherwise qualified individual . . . shall solely by reason of his handicap be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.[4]

Section 504 will be administered by the Office for Civil Rights in the same general manner as is Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. Thus, if any public education agency is not in compliance with Section 504, that agency could jeopardize all federal funds it receives for education (for example, Title I of the Elementary and Secondary Education Act, Vocational Education, and funds specifically earmarked for the handicapped).

Subpart B. State Plans and Local Applications

Subpart B: State Annual Program Plans and Local Applications. This subpart deals with the mechanics of making Part B grants available to state and local education agencies. Each state must submit an annual program plan to the Commissioner of Education, and each local education agency must submit an annual application to the state. Subpart B also includes the requirements for

participation by the Bureau of Indian Affairs and the general requirements relating to public participation by each agency eligible to receive a Part B grant.

Subpart C: Services. Regulations governing the major service components required under Part B are contained in this subpart. These include free appropriate public education, full educational opportunity goal, priorities in the use of Part B funds, individualized educational programs, direct services by state education agencies, and the state comprehensive system of personnel development.

Subpart C. Services

1. *Free appropriate public education.* The regulations include the statutory requirement that a free appropriate public education must be made available to all handicapped children aged 3 through 18 by September 1, 1978, and to all handicapped children aged 3 through 21 by September 1, 1980. The provision does not apply to handicapped children aged 3–5 and 18–21 if it conflicts with state law, state practice, or the order of any court. Thus, in effect, each state must serve handicapped children within its mandated age range, but the bottom line for every state is age 6 though 17. Handicapped children in the 3–5 and 18–21 age ranges must be served to the same extent that nonhandicapped children of these ages are served.

The provision for a free appropriate public education means that each state must serve handicapped children within its mandated age range, and that the bottom line for every state is age 6 through 17.

In addition, the PL 94-142 regulations incorporate two basic requirements from the section 504 regulations.

> If placement in a public or private residential program is necessary to provide special education and related services to a handicapped child, the program, including non-medical care and room and board, must be at no cost to the parents of the child.[5]

> Nothing in these regulations . . . relieves an insuror or similar third party from an otherwise valid obligation to provide or pay for services provided to a handicapped child.[6]

The Part B regulations also require physical education to be made available to every handicapped child who is receiving a free appropriate public education. The child must participate in the regular program of physical education or in a specially designed program.

2. *Priorities.* The regulations include the statutory requirement that state and local education agencies establish priorities in the use of Part B funds, first with respect to handicapped children who are not receiving an education, and second with respect to handicapped children within each disability area who have the most severe handicaps and who are receiving an inadequate education. With the exception of state administration funds, each state and local education agency must use all of its Part B entitlement in accordance with these priorities.

First-priority children are those who are not receiving an education; second-priority children are those with the most severe handicaps who are not receiving an adequate education.

The final regulations were responsive to a unanimous concern regarding inservice training, which was raised by advocates, agencies, and teacher trainers. That concern focused on a potential "Catch-22" situation in which an agency is required to provide a free appropriate public education to a first-priority child and *then* provide inservice training to the child's teacher. To ameliorate this concern, the final regulations state, in effect, that the Part B funds may be used for inservice training concurrently with placing a first-priority child in school. However, the provision of inservice training may not be used as a precondition for service to children.

The individualized educational program is the key provision of the law and of the regulations.

3. *Individualized educational program* (IEP). This is the key provision in the law and regulations. The IEP is defined as a written statement for a handicapped child, developed in a meeting that includes a representative of the agency, the parent, the teacher and, where appropriate, the child. This written statement includes five basic components: (a) present level of educational performance, (b) annual goals and short-term objectives, (c) specific educational services to be provided to the child and the extent to which the child can participate in regular education, (d) starting date and duration of services, and (e) evaluative criteria and procedures for determining whether the objectives have been achieved.

More comments were received on IEP requirements than on any other part of the proposed rules. The two areas that received greatest attention or have been most misinterpreted are concerned with participants in IEP meetings and the content of the IEP.

The attendance of a large group at an IEP meeting can be unproductive and very costly, and could essentially defeat the purpose of securing active, open parent involvement.

A number of comments suggested that *participants in IEP meetings* should include all direct service personnel who work with the handicapped child. Other comments recommended decreasing the number of participants. In some instances, agencies have included as many as 15 school staff members in an IEP meeting with the parent of one handicapped child. The final regulations require only the participants listed in the statute. Generally, attendance of a large group at an IEP meeting can be unproductive and quite costly, and could essentially defeat the purpose of ensuring active, open parent involvement. Although all personnel working with a particular child should be informed about the child's IEP and involved in its implementation, this does not mean that they must attend the IEP meeting. Instead, they can be involved and informed through regular administrative procedures. (For example, the resource room teacher of a blind child communicates with and provides assistance to the child's regular teachers.)

While very large IEP meetings might often be inappropriate, there may be instances when additional participants are essential. Therefore, the final regulations retain a provision from the proposed rules that authorize the attendance of other participants at the discretion of the agency or the parents.

Regarding the *content of the individualized educational program,* the proposed rules (1) provided that each child's IEP include a statement of specific educational services needed by the child (determined without regard to the availability of those services) and (2) contained extensive details that went beyond the wording of the statute. There were few, if any, letters received during the public comment period that specifically supported the inclusion of these additional details. In fact, many people expressed concerns about over-regulation and found these requirements unnecessarily burdensome. On the basis of these inputs, the Bureau elected to delete the additional details included in the proposed rules and to adopt the statutory language on the IEP content essentially verbatim (i.e., a statement of specific special education and related services to be provided to the child).

Some parties have interpreted the final regulations to mean that a public agency must provide to a handicapped child only those services that are available to the agency. This interpretation is not correct.

As a result of this change, some parties have interpreted the final regulations to mean that a public agency must provide to a handicapped child only those services that are available to the agency. This interpretation is not correct. On November 17, 1977, the Bureau of Education for the Handicapped sent to Chief State School Officers an informal letter clarifying its position on the content of the individualized educational program. This letter included the following statement:

Although the wording on IEP content was changed in the final regulations, our position on the critical issues of need and required services for individual handicapped children has not been altered. We do not wish to change this basic position and, under the statute and extensive legislative history, we have no authority to do so.[7]

Subpart D: Private Schools. Subpart D sets out the requirements relating to two distinct categories of handicapped children in private schools: (a) children placed in or referred to private schools or facilities by a public agency in order to provide them with special education and related services and (b) children enrolled in private or parochial schools by their parents, but not placed there by a public agency to receive special education.

Subpart D. Private Schools

Subpart E: Procedural Safeguards. Subpart E implements the procedural safeguards set forth in the Act, including due process procedures for parents and children, protection in evaluation procedures, least restrictive environment, confidentiality of information, and procedures of the U. S. Office of Education.

Subpart E. Procedural Safeguards

1. *Due process procedures for parents and children.* Section 615 of the statute, which deals with due process procedures, is so detailed and specific that this entire section was incorporated essentially verbatim into the final regulations. Provisions range from prior written notice in all matters concerning identification, evaluation, and educational placement of a handicapped child to detailed hearing rights, state education agency appeal procedures, and civil action.

Due process provisions include the identification, evaluation, and educational placement of a handicapped child; detailed hearing rights; state education agency appeal procedures; and civil action.

Some further provisions, added by the regulations, include: (a) parent consent for preplacement evaluation and initial placement, (b) mediation (an added comment encourages, but does not require, the use of mediation as an intervening step prior to conducting an informal due process hearing), and (c) specific timelines for hearings and appeals.

2. *Protection in evaluation procedures.* Subpart E also includes the statutory requirements on nondiscriminatory testing. Since these provisions apply to evaluation of all handicapped children, the more general term, "protection in evaluation procedures," has been substituted. Criteria and procedures are essentially the same as those in the Section 504 regulations. In effect, these provisions are designed to ensure that evaluations will be multi-factored and multi-sourced; that they will be conducted by qualified personnel; and that placement decisions will be made by a group of persons and not by an individual.

Evaluations will be multi-factored and multi-sourced and will be conducted by qualified personnel, and placement decisions will be made by a group, not by an individual.

3. *Least restrictive environment.* The provision on least restrictive environment states that procedures must be established to ensure that, to the maximum extent appropriate, handicapped children are educated with children who are not handicapped. This topic received a surprising amount of attention during the public comment period. Many commenters were concerned about the possibility of overzealous implementation of this provision without regard to the needs of either handicapped or non-handicapped children. The Bureau response was the same in both the proposed and final rules. A process approach is recommended which provides that each handicapped child's placement must be determined individually and annually, and that the vehicle for making that determination is the child's individualized educational program.

Placement must be determined individually and annually, and the vehicle for making that determination is the child's individualized educational program.

In answer to concerns about disruptive or potentially dangerous students,

The Bureau incorporated the following statement from the analysis of the Section 504 regulations:

> . . . it should be stressed that, where a handicapped child is so disruptive in a regular classroom that the education of other students is significantly impaired, the needs of the handicapped child cannot be met in that environment. Therefore, regular placement would not be appropriate to his or her needs.[8]

Subpart F. State Administration

Subpart F: State Administration. Three major areas are delineated in this subpart: (a) state education agency responsibilities, including general administrative and supervisory responsibilities required by Section 612(6) of the Act, monitoring and evaluation requirements, and complaint procedures, (b) use of funds for state administration, and (c) state advisory panel.

Subpart G. Allocations of Funds; Reports

Subpart G: Allocations of Funds; Reports. Included here are the statutory formulas for making funds available to state and local education agencies, as well as the procedures for counting the number of handicapped children receiving special education and related services. The allocation of funds to states is based on the annual child count.

Incentive Grants

Incentive Grants. The final regulations contain a separate part on incentive grants, which is authorized by Section 619 of the Act. This part sets forth the conditions under which states may receive grants to assist in the education of handicapped children aged 3 through 5. Congress established the incentive grants provision in recognition that, when education begins at the early stages of development, (a) benefits are maximized, (b) additional or more severe handicaps may be prevented, and (c) greater long-term cost effectiveness is realized. The incentive grants provision is a separate funding authority from the regular Part B program, and any state which serves handicapped children in the 3–5 age group and which submits an application is eligible to receive a grant under this provision.

We see the issuance of the "final" regulations not as an end, but as the real beginning of a long, continuous effort to develop, interpret, and disseminate policies relating to the implementation of this very significant law.

The publication of the final regulations under Part B, as amended by Public Law 94-142, is a major accomplishment, and people have been generally pleased with the product. In a regulation package of this magnitude, it is quite possible for specific provisions to be misinterpreted or misunderstood. We in the Bureau of Education for the Handicapped hope that you will read the regulations very carefully, and if you are not sure about a particular provision, please call us.

We see the issuance of the "final" regulations not as an end, but as the real beginning of a long and continuous effort to develop, interpret, and disseminate policies relating to the implementation of this very significant law affecting the education of all handicapped children. We look forward to working with you in this endeavor.

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[3] Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II.

[4] Public Law 93-312, Rehabilitation Act of 1973, Section 504, Title V.

[5] Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), August 23, 1977, Part II, Section 121a.302 (page 42488).

[6] Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II, Section 121a.201(b) (page 42488).

[7] Bureau of Education for the Handicapped. Division of Assistance to States Bulletin #5 (Informal letter to Chief State School Officers), November 17, 1977. (Copies may be requested from the Bureau of Education for the Handicapped.)

[8] Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II, comment on Section 121a.552 (page 42497).

COOPERATIVE MANPOWER PLANNING

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To reconcile shortages and surpluses in the supply of professionals, a concerted manpower planning effort is necessary.

IN THE past twenty years, college and university training programs in special education have undergone a remarkable expansion, which has been fundamental in relieving personnel shortages that existed across the nation. Now, however, many of these shortages no longer exist and, in fact, surplus manpower is available in certain teaching areas, while training programs appear to be unnecessarily duplicated in some parts of the country. At the same time, the thrusts of Public Law 94-142 have created new personnel requirements that are not being sufficiently answered. To reconcile these surpluses and shortages in the supply of professionals, a concerted manpower planning effort is necessary.[9]

In the late spring of 1974, the Division of Personnel Preparation of the Bureau of Education for the Handicapped set up meetings in a number of states to discuss the need for cooperative manpower planning. Attendees at these meetings were essentially representatives of training programs receiving Part D funds, state education agency representatives, and Bureau staff members. For their deliberation, they received a document known as the BEH directive on cooperative manpower planning,[10] which spelled out Bureau thinking about manpower problems and their solutions. In essence, it appears that the Division of Personnel Preparation was saying:

> You know what your personnel needs are better than we do. You also know what your overall training resources are better than we do. In view of that, why don't you people, within each of the states, get together yourselves—training personnel, state and local education agency consumers, maybe parents and others who are concerned—and develop your own manpower planning system? Then when we look at your Part D training proposals, we can see not only how your proposals address themselves to national priorities, but also to individual state needs.

Over the past three years, this recommendation has been recognized nationally, and today all of the states are expected to be involved in the development of a statewide cooperative manpower plan. Moreover, to meet the compliance procedures of Public Law 94-142, and to make possible the expected national program expansion, the Bureau of Education for the Handicapped is now, more than ever, encouraging the development of cooperative manpower planning programs.[11]

The University of Missouri's special project provides technical assistance to help states develop programs of cooperative manpower planning.

The University of Missouri at Columbia is operating a special project that is intended to help states and regions achieve such programs. This project provides technical assistance to each of the 50 states and 6 territories, in terms of technologies and strategies that have been found to be effective in manpower planning. When we provide this assistance, however, we do not suggest that we have all the answers, nor even 50 percent of the answers. Our focus is on the sharing of information, the exchange of ideas that seem to be effective (or not effective) in various states. In addition, we are engaged in some specific activities that will hopefully promote this kind of exchange. For example, we publish a newsletter and have produced several books concerned with manpower planning.[12,13,14,15] We have sponsored symposia and operate continuing regional workshops that are announced in the newsletter. In addition, over the past 15 months, we have visited and worked with cooperative manpower planning committees and task forces in 31 different states. We provide this kind of long-term collaboration only at states' requests, and we work with them to develop, plan, structure, implement, and evaluate their programs for manpower planning. More specifically, these tasks include:

We provide this kind of long-term collaboration only at states' requests, and we work with them to develop, plan, structure, implement, and evaluate their programs for manpower planning.

- Clarifying the Bureau's manpower planning directive.
- Determining the state's current situation in terms of the number and types of children to be served, the service needs and existing resources, current training resources, and needed personnel in critical areas.
- Delineating the purposes and functions of cooperative manpower planning committees.
- Identifying types of data to be collected.
- Planning for uses of data.
- Determining representation on committees.
- Reviewing force-field analysis techniques.
- Planning resource development alternatives.
- Developing a staffing plan and time line format.
- Proposing budget formats.
- Introducing program component alternatives.
- Designing a dissemination plan.
- Working on problem analysis and clarification.
- Defining the functions of group process specialists.
- Defining organizational alternatives.
- Developing work plans.

The status of cooperative manpower planning in 1976

Notwithstanding the considerable emphasis placed on cooperative manpower planning since 1974, there is still variation among the states on the extent to which they have taken the BEH directive seriously. Whereas the enforcement of the directive is ultimately the responsibility of the Division of Personnel Preparation at the Bureau, the Missouri project simply endeavors to be of assistance to states in the implementation of the directive. Accordingly, in 1976 we conducted a status study in an attempt to determine what was taking place throughout the country in terms of cooperative manpower planning, and we are now preparing to update the data we gathered then. Some of the findings are significant to trainers and public school people alike:

Extent of manpower planning

1. Seemingly, just about all of the states now have some type of cooperative manpower planning committee, at least in name. However, the extent to which these committees are involved in statewide planning varies considerably.

2. In some cases, confusion exists as to the name and functions of the

committee. In one state, when we asked four respondents the name of their committee, we received four different answers. Therefore, additional work may be necessary to make professionals more aware of their committees.

Committee membership

3. As far as committee membership is concerned, the two constants are college and university participation and state education agency participation. In addition, local education agency membership exists in the vast majority of states. Beyond these entities, committees have varied representation, including people from departments of mental health, voluntary health organizations, vocational rehabilitation agencies, and other groups. Nor are parents and regular school personnel strangers to committee membership.

Frequency of meetings

4. Most state committees average four to five meetings per year, but the range is from one meeting per month to only one meeting per year. Subcommittees and task forces also meet at various times.

Funding for committee operation and maintenance

5. An item that has persistent implications is the matter of special funding for the operation and maintenance of the various state manpower planning committees. Thirteen states reported some type of special funding to assist these committees. In most instances this involved Part D monies—usually the state education agency's Part D monies. This means that the state would include, as a component of its Part D proposal, some assistance to the state cooperative manpower planning program. There is no question that this funding, usually in the neighborhood of $10,000 to $15,000 per state, has enabled many committees to accomplish things that would otherwise have taken much longer to achieve. It is also true that, in general, states providing some kind of special funding are able to do more in cooperative manpower planning than states that provide no support.

The funds themselves are used in various ways:

- As travel allowances to permit more frequent meetings of committees, subcommittees, or task forces.
- For the publication of newsletters and other reports, thus ensuring greater communication among committee members and task force participants, and for awareness of committee work throughout the state.
- To pay for postage and mailing necessary in needs assessment studies.
- As salaries for a part-time coordinator, secretarial assistance, and other personnel.

Decision-making authority

6. One of the more interesting issues we approached, and one that remains a problem, relates to how the respondents characterized their own state's cooperative manpower planning committee. More often than not, they described their state's committee as ". . . a formally organized committee, but with little or no decision-making authority." This reported lack of clout does not correspond to what is required in the manpower and training sections of Public Law 94-142:

> Section 613(a) . . . (3). set forth, consistent with the purpose of this Act, a description of programs and procedures for (A) the development and implementation of a comprehensive system of personnel development which shall include the inservice training of general and special educational instructional and support personnel, detailed procedures to assure that all personnel necessary to carry out the purposes of this Act are appropriately

and adequately prepared and trained, and effective procedures for acquiring and disseminating to teachers and administrators of programs for handicapped children significant information derived from educational research, demonstration, and similar projects and (B) adopting, where appropriate, promising educational practices and materials development through such projects . . .[16]

Section 614(a)(1) . . . (c) establish a goal of providing full educational opportunities to all handicapped children, including (i) procedures for the implementation and use of the comprehensive system for personnel development established by the state educational agency under section 613(a)(3).[17]

On this basis, if each state is to participate fully under the provisions of the new law, then each state must establish and implement a comprehensive system of personnel development. It seems logical that primary leadership for this activity should emanate from each state's cooperative manpower planning committee, for it is this committee and the state education agency that have the expertise and the knowledge base to develop vital and functional personnel development systems.

The personnel development section of Public Law 94-142 will have great impact on all of those concerned with the supply of professional manpower.

The personnel development section of Public Law 94-142, cited above, will have great impact on all of those concerned with the supply of professional manpower. This impact rests not only with university training programs, but with state and local education agencies as well. Each state education agency must submit an annual program plan describing its participation under Public Law 94-142, and each of these programs must "include a description of programs and procedures for the development and implementation of a comprehensive system of personnel development. . . ."[18] The primary focus of this comprehensive system of personnel development is on inservice training. However, when considering this comprehensive system, it seems that a state would also have to look at what is taking place in preservice training, inasmuch as the numbers and types of people being trained within a state at the preservice level will affect the nature of inservice training that is needed. In addition, the training resources that exist at the preservice level are usually critical for the creation of effective inservice training programs.

The regulations for Public Law 94-142 also require that, within a given state, all colleges and universities that have an interest in special education personnel training have "an opportunity to participate fully in the development, review, and annual updating of the comprehensive system of personnel development"[19] At this point, comprehensive manpower planning should enter the picture. Those states that have functioning manpower planning committees should broaden the scope of the committees to encompass many of the responsibilities included under Section 613(a)(3) of the law. It does not seem efficient for a state to have two committees that focus on the same things: manpower planning, personnel development, and teacher training concerns. Why have one group that is concerned only about Part D funds (i.e., the BEH directive) and another group that is concerned only about Section 613(a)(3) of Public Law 94-142? If the Part D persons and the Public Law 94-142 persons within a state education agency are communicating and working together, and if college and university people are involved, then these matters may be meshed into a workable whole for one committee.

Inservice training is going to be very big business.

The bottom line of all of these matters is the fact that inservice training is going to be very big business as time passes. Local education agencies are going to be extensively involved in this training, as will state education agencies. For the first time, the local districts will have substantial funding to carry out inservice programs. It is most important that teacher educators have an opportunity for input into the nature of the inservice programs that will be supported through Public Law 94-142. Certainly college and university personnel have expertise in training and the delivery of instruction.

Moreover, the cooperative manpower planning committees, if they are involved in the Section 613(a)(3) provisions of the Act, can serve as quality control agents in relation to inservice training within a state. In addition, many areas of potential conflict between institutions of higher education and state departments may be avoided in this manner. Effective training requires a partnership among many groups and agencies. Cooperative manpower planning can be the vehicle for attaining that partnership.

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[9] Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

[10] Bureau of Education for the Handicapped/Division of Personnel Preparation. Cooperative planning for personnel preparation, April, 1974.

[11] Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

[12] Schofer, R. C., & McGough, R. L. *Proceedings of the First Missouri Symposium on Cooperative Manpower Planning for Special Education.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, May, 1976.

[13] Schofer, R. C., & McGough, R. L. *Statewide cooperative manpower planning in special education: A status study.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, November, 1976.

[14] McGough, R. L., & Schofer, R. C. *Cooperative manpower planning: Annotated bibliography.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, October, 1976.

[15] Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives.* Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

[16] Public Law 94-142. Education for All Handicapped Children Act of 1975, Section 613(a)(3), November 29, 1975.

[17] Public Law 94-142. Education for All Handicapped Children Act of 1975, Section 613(a)(3), November 29, 1975.

[18] Department of Health, Education, and Welfare, Office of Education. *Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act.* Comprehensive system of personnel development. *Federal Register,* Tuesday, 42(163), August 23, 1977, Part II.

[19] Department of Health, Education, and Welfare, Office of Education. *Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act.* Comprehensive system of personnel development. *Federal Register,* Tuesday, 42(163), August 23, 1977, Part II.

Chapter 4

INSERVICE PROGRAMMING AND PRESERVICE PRIORITIES

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Division of Personnel Preparation
Bureau of Education for the Handicapped

APPROXIMATELY 250,000 teachers are working in special education in this country today, and their rate of attrition is around 6 percent. A few more than 25,000 new people enter the field each year after completing preservice training, but, when the attrition rate is considered, this leaves only about 10,000 additional teachers who enter the manpower pool annually. However, to serve between 7 and 8 million children, we know that we need 500,000 teachers and support personnel. Since we also know that many of these children must be served in the least restrictive environment of the regular classroom for at least part of the school day, it becomes clear that a large group of the 250,000 additional personnel we need must be recruited and retrained from the ranks of regular educators. It will not be possible to give these youngsters the best education unless regular teachers understand exceptional children and how to work with them. Thus, a major area of development, both now and in the future, will be the comprehensive inservice training of regular educators.

A large group of the 250,000 additional personnel we need must be recruited and retrained from the ranks of regular educators.

The Division of Personnel Preparation of the Bureau of Education for the Handicapped has been supporting the training of regular educators since 1974, and, for the current fiscal year, over 46 percent of its budget (or $29,982,000) is available for inservice training. A significant portion of this amount was appropriated by the Congress specifically for the development of inservice programming, and thus the Bureau's allocations must be tracked by means of separate and distinct proposals that address this priority.

Simply addressing the priority, however, is not enough. The Division of Personnel Preparation is not interested in perpetuating the inadequacies and disappointments that have traditionally occurred in the inservice training of teachers over the years. The Division *is* interested in the underwriting of projects that will help all personnel contributing to educational programs for handicapped children to develop the necessary attitudes, skills, and knowledge to carry out their responsibilities under Public Law 94-142. Such projects should provide for inservice in all of its dimensions, and should be characterized by productive interaction. To do so, they must be needs based, conducted over time, evaluated, and recycled,[20] and they must demonstrate cooperative planning with local school district personnel, including representatives of the various audiences that will be trained. In addition, they must have a plan for reporting the results of training *in the form of performance data from trainees and from children.*

The Division of Personnel Preparation is not interested in perpetuating the inadequacies and disappointments that have traditionally occurred in the inservice training of teachers over the years.

One-shot workshops are not sufficient; training must address, over time

One-shot workshops are not sufficient.

and in depth, the knowledge and skills needed to teach children with a specific disability in a specific subject area, in terms of: systematic teaching from an individualized educational plan; decisions about assessment procedures, skills, roles, objectives, and materials; effective communication and cooperative planning with others, including professionals, parents, and students. We are also encouraging consortium arrangements among local education agencies, as well as collaboration between these consortia and institutions of higher education. Moreover, inservice support projects will be needed—projects that provide preparation for those who actually train various target audiences. This kind of training may focus, for example, on special education content, successful and operational service delivery systems, or other skill areas needed for the creation of professional development programs.

In August 1977, an advisory group developed a set of recommendations to inservice practitioners.

As part of the division's effort to develop a nationwide inservice delivery system, an advisory group was convened on August 25 and 26, 1977, and was charged with developing a set of recommendations to inservice practitioners. Their recommendations supplement the Division's position that the implementation of Public Law 94-142 will occur in our nation's schools, and that the Division's responsibility is to ensure that appropriate personnel are adequately trained through inservice programs to carry out their responsibilities under the law.

The advisory group's major recommendations are organized according to major headings from Office of Education form 9049, 9/75, *Proposal Evalution-New Applications*, and are summarized as follows:[21]

Need

Educational Significance: Need. It is recommended that proposals:

- Respond to those manpower development needs identified in local and/or state education agency annual program plans, and provide data demonstrating this relationship.
- Be consistent with the content of a state's comprehensive system of personnel preparation or provide justification based on data for alternative directions.
- If presenting data from a needs assessment, ensure that those data represent the perceptions of need identified by both regular and special educators; all concerned constituencies should be involved in the assessment of special education inservice needs.

Impact

Educational Significance: Impact. It is recommended that proposals:

- Specify target training audiences and describe the impact of the training on each of the audiences. The selection of training audiences and the description of the proposed impact should be expressed in terms of the implementation of Public Law 94-142, at the local school level.
- Clearly identify the anticipated outcomes of the training in terms of changes in attitude, knowledge, skills. The impact should be described for each target training audience.
- Report projected impact by target audiences, schools, school districts, intermediate units, and so forth, if serving a consortia of local education agencies.

Planning

Project Design: Planning. It is recommended that proposals:

- Reflect an understanding of the requirements of state and federal regulations.

- Provide evidence that the initial planning included the input of representatives of the various target training audiences.
- Provide a plan which describes procedures for continuing input from the target training audience.
- Report program objectives and actual instructional sequences for each target training audience.
- Outline specific procedures to ensure that program objectives and instruction relate to a comprehensive set of teacher behaviors which have been agreed upon by the participants of the program, and that these teacher behaviors facilitate progress toward child goals identified in their individualized educational plans.
- Include on-the-job follow-up of the training as part of the instructional program.
- Contain evidence that project personnel were selected via a system for identifying and utilizing available human resources for inservice training. This includes human resources in the school and those relating to the school, such as institutions of higher education, state education agencies, intermediate education units, or diagnostic centers and, in general, personnel serving handicapped persons in the same geographic area.
- Include procedures for multiplying or expanding the effects of the program beyond the initial direct participants.
- Outline a dissemination plan for enabling others to replicate the project.
- Describe the relationship between this special education inservice program and other inservice programs serving the school.

Project Design: Procedures. It is recommended that proposals: *Procedures*

- Relate the content and organization of the inservice program to each participant's professional development, and show that personalized or individualized instruction modeling the child's individualized educational plan is encouraged.
- Cite and discuss relevant inservice research regarding both special and general education.
- Have at least some building-based activities with principals in alternate roles of leadership and learning.
- Include specifically delineated content for either the entire inservice program or part of the program, with specific procedures identified for determining the content of the entire program.
- Delineate the sites and times of program activities as agreed upon by those concerned.

Project Design: Staff. It is recommended that proposals: *Staff*

- Provide statements of policy and data which assure quality control for staff selection and performance, including provisions for participant evaluation of the program leader's performance.
- Make peer training a feature of the program.
- Show that school-based personnel provide assistance in follow-up activities, both training and evaluation.

Evaluation. It is recommended that proposals: *Evaluation*

- Set aside a specified amount of project funds (5 to 10 percent) for evaluation.

- Include in the evaluation design the systematic assessment of children and of participants on the job.
- Include parents and students as important sources of evaluative data.
- Include evaluative data that may be composed of: attitude change, knowledge gain, skill development, and organizational change, as well as any data that show that Public Law 94-142 is being implemented as a result of inservice training.
- Relate to a comprehensive set of teacher behaviors that have been agreed upon by participants of the program.
- Include milestones for feedback from participants for the purpose of possible program modifications. This section should identify these decisions, report the type of data to be collected, and discuss possible modifications.
- Specify an evaluation design consistent with program objectives and identify evaluative procedures for the various target groups receiving training.

Project Support

Project Support. It is recommended that proposals:

- Include a specific time line for phasing out funding from the Division of Personnel Preparation.
- Include a plan ensuring that the local education agency will, within a specified period of time, assume as much of the primary responsibility for the inservice program as possible, with other agencies in supportive roles.
- Contain a description of organizational structures that exist or are planned to support participatory planning, implementation, and evaluation as evidence of organizational commitment.

Although the foregoing recommendations do not represent a directive, they are the best suggestions that the Division can offer at this time to those who desire to establish comprehensive programs of inservice training for general educators. Additional recommendations from the field will be welcomed by the authors.

Preservice education is our fundamental answer to attrition, and to certification.

This emphasis on inservice programming does not mean that we are not going to attend to preservice training. At our present manpower level, with 250,000 people in place, attrition is costing us about 15,000 professionals each year. The only way we are going to continue to have their replacements is through preservice education, which is also the primary way that we may attend to certification.

Our priorities and the amount of money assigned to each (Table 6) underline our commitment to preservice training, particularly in the areas of early childhood, severely handicapped education, paraprofessionals, physical education, recreation, vocational and career education, and training for interdisciplinary programming. These are complex times in special education.

We no longer have the "silver bullet" in special education.

We no longer have "the silver bullet," or the unidimensional solution to our problems. To offer early childhood programs, for example, our people need to collaborate with child care and Head Start projects and bring to their work a thorough understanding of child development. To teach the severely and profoundly handicapped, one must relate to medical personnel, rehabilitation specialists, occupational and physical therapists, nutritionists, and others. Those preparing to work with seriously disturbed youngsters will need to relate to mental health centers and private clinics, while those of us preparing general

special educators must understand the organizational dynamics and goals of teachers' organizations and unions. Finally, it is of exceeding importance that teachers and support personnel are skilled not only in counseling parents but in bringing them into active roles in their children's education. Thus, interdisciplinary training needs to take place in every area of personnel preparation, and this is an area in which we have a long way to go: programs are often too constrained and one-dimensional.

Individualized educational planning, the question of appropriateness, and constitutional rights are inevitably linked.

In reality, the roles of teachers have changed and are continuing to change. The teacher is now a prime institutional advocate, a coordinator of assessment, a coordinator of remediation, a troubleshooter, the hub of a team composed of various professionals, and the person responsible for the individualized educational program. It is on the IEP that the entire issue of an *appropriate public education* hinges. The question of appropriateness leads directly to the issue of constitutional rights. Thus, our most significant task may well be the determination of appropriateness. Part of the answer will lie in whether or not we are helping personnel to prepare not just for the mechanics, but also for the dynamics, of individualized educational planning; whether the personnel we train will be competent in demonstrable ways; and whether we ourselves are competent.

The philosophy of the Dean's Grants is to provide an opportunity to deans of schools or colleges of education to reconceptualize the preparation curricula so that the needs of handicapped children may become an integral part of teacher training.

In our concern for preservice programming, an area of particular interest is the preservice training of general educators—the Dean's Grant program. The philosophy behind these grants is to provide an opportunity to deans of schools or colleges of education to reconceptualize the preparation curricula so that the needs of handicapped children may become an integral part of teacher training, rather than an afterthought. This is change from within, and the intent is to end the separation of handicapped from non-handicapped children throughout the entire educational community. Thus, the Dean's Grant program encompasses both graduate and undergraduate programs. In order to touch all aspects of public school responsibility, the focus is not only on the potential classroom teacher but also on the career education of principals, supervisors, and all others involved in educational services.

The Dean's Grant is a massive change agent.

Because the key to the success of Dean's Grants is the authority, responsibility, and decision-making capability that will bring about change, the Dean himself should act as project director. In specific cases, however, a person in an equal position with equal authority can also be considered to direct the project. This kind of leadership is necessary because the Dean's Grant is a massive change agent, an innovation to be adopted throughout the college of education and its faculties.

Procedures for Dean's Grant application, evaluation, and program approval are the same as those for every other project submitted to the Division of Personnel Preparation. The three-year program approval can be renewed, if necessary. There is, however, no formula for the success of a Dean's Grant; its activities and objectives can be defined only by those at the institution of higher education. Since enduring change must come from within, deans must suggest to us their own perceptions of their institutions, and the unique ways by which this kind of innovation may be brought about.[22]

In the same sense that inservice training of general educators will lead to education in the least restrictive environment for the mildly and moderately handicapped, the Dean's Grant program will add considerably to the body of professionals who will be effective with these youngsters in the regular

classroom. If eventually *all* professionals were prepared to serve *all* children, many educational problems of handicapped children would be solved. For that reason, the Dean's Grant program is of great significance.

In 1975, only one person in the United States and its territories attained a doctorate in the area of the visually handicapped.

Preparing personnel to serve the visually handicapped is still another major concern, because this area is critically understaffed on a national level. When the Division of Personnel Preparation began to underwrite program assistance grants in 1970, many people in the field found it easier to train teachers to serve children with less complex handicaps, and numerous training programs were established to prepare teachers of the emotionally disturbed, learning disabled, and mildly retarded. At the same time, there were diminishing numbers of programs to prepare teachers or teacher trainers in the area of the deaf, the deaf-blind, and the blind. In 1975, only one person in the United States and its territories attained a doctorate in the area of the visually handicapped. Even more shocking is the fact that there are currently only five major programs in the country that offer any doctoral level training in this area.

There are only five major programs in the country that offer any doctoral level training in the area of the visually handicapped.

Thus, people who are operating programs to train master's students to serve the visually handicapped should keep these programs within their proposals for program assistance, as should those who are operating undergraduate programs. On the other hand, those who have undergraduate, master's, and doctoral programs should enter all of this under one application that is headed *Doctoral Program in the Area of the Visually Handicapped* in capital letters. Because it is not feasible to fund a doctoral program without its underpinnings and antecedents, this entire interlocking training system needs to be shown. The area of training for service to the visually handicapped is in critical need and must have new blood as rapidly as possible. To fill this need, the Division will support not every proposal, but those that promise to provide the most exemplary services and training plans.

We must adjust our sights to get the right things done and to see the problems through.

In matters of meeting critical manpower needs, of ensuring expertise among regular educators, and in recruitment, the Division of Personnel Preparation is responsible, in the long run, to the Congress. If the House or Senate requests a report on how the budget has been spent, its members want to know exactly where the money is. For this reason, professionals in the field need to understand the budget and priorities. This Division gives financial support to continuation grants and to new grants; it does not deal with noncompeting new grants. Proposals must, therefore, attend to target priorities that are fundable. Simply because a program received $200,000 last year does not necessarily mean that it will receive $200,000 this year. The Division's budget has not increased in the past three years, and this puts us all in a difficult position. We must adjust our sights in order to get the right things done and to see the problems through. The purpose of this chapter has been to define what some of those right things are.

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[30] Harvey, J. Education for the handicapped regulations. In *Teacher centers as an approach to staff development in special education: Conference report*. Newport, Rhode Island: Rhode Island Teacher Center, June 5–7, 1977. (Published by ERIC Clearinghouse on Teacher Education, Suite 616, One Dupont Circle, Northwest, Washington, D. C. 20036)

[31] Bureau of Education for the Handicapped/Division of Personnel Preparation. Information bulletin #1: Informal letter to inservice practitioners. September, 1977. (Copies may be requested from the Division of Personnel Preparation, Bureau of Education for the Handicapped)

[32] Behrens, T., Project Officer, Eastern Region Branch, Division of Personnel Preparation, Bureau of Education for the Handicapped. Personal communication, November 15, 1977.

INNOVATION AND EVALUATION IN PERSONNEL PREPARATION

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Special Projects have moved toward problem-solving and away from pure model implementation.

IN ADDITION to providing program assistance for preservice and inservice training, the Division of Personnel Preparation awards Special Project grants for the following purposes:

1. To design personnel preparation programs that, upon implementation and evaluation, may be more effective and efficient than current operational preparation programs;

2. To identify major problems relevant to the preparation of personnel for the education of handicapped children and to develop procedures for the solution of such problems.[23]

When the funding of Special Projects began in 1968, we were engrossed with innovative programs and new approaches that met the first expressed purpose of these grants. The aim was to have an impact on specific areas of development—areas that were little understood in terms of the directions that should be taken. Thus, earlier projects were primarily concerned with pure model implementation, and, through these grants, the initial efforts in early childhood and resource teacher training were made possible. In recent history, the education of the severely and profoundly handicapped has also benefitted from a concentrated effort.

Within the past two years, because of the difficulties associated with preparing to implement Public Law 94-142, the second purpose of the Special Projects has become quite prominent. As we have moved toward the development of solutions for major training problems, we have also underwritten programs in evaluation training, dissemination, and manpower planning—all of which are intended to assist in the creation of effective approaches to solving these problems.

Proposals for these projects are becoming more sophisticated and comprehensive. This year, requests for Special Project monies exceeded for the first time the budget the Division could spend. Of the 126 programs considered, 39 were continuations and 87 were new grants. In the final analysis, 39 continuations and 20 new grants were awarded. It was necessary to create the category "approved without funding" for 16 projects in recognition of the quality of some of the proposed programs that could not be funded. (A short directory of all Special Projects funded since 1968 is available through ERIC.[24])

While the Special Projects budget represents the risk capital of the Division of Personnel Preparation, the projects themselves are intended to be of national

We are less concerned with what is new, and much more concerned with what is good.

importance, and the risks are taken for the purpose of propelling programs toward the cutting edge in the advancement of education for handicapped children. Over the past several years, we have experienced a shift in emphasis, a philosophical change. We are now less concerned with the question of what is new, and much more concerned with the question of what is good. The latter is a crucial issue, reflecting a maturing process that requires professionals to identify the current and projected needs of teachers and trainees, to make well considered plans, and to conduct programs that can be shown to demonstrate improvement in personnel preparation practices. These objectives relate directly to our concern for the validation and dissemination of programs.

Six years ago, the field was not particularly data conscious.

This concern for what is good holds true not only for the Special Projects but also for every program supported by the Division of Personnel Preparation. It is, moreover, a concern that has grown over a period of years. In 1971, when the Division began the funding of program assistance grants, a national meeting was held in Washington—the Division's first major interaction with the field in that kind of setting. A critical factor introduced at that meeting was the requirement for evaluation designs as part of program assistance grants. A glance through the 1971 proposals would reveal ample evidence that considerable work was needed on everyone's part to meet this requirement. For example, many proposals included no mention of evaluation, and those that did rarely included more than a one-page description of some activities. Most did not describe a design but merely a series of incidents without pattern. And because the field was not particularly data conscious six years ago, there was little provision for using evaluation data to modify programs.

Out of the expressed need for assistance in the development of adequate evaluation plans, the University of Virginia's Evaluation Research Center undertook an extensive effort to create an appropriate evaluation system for personnel preparation programs. Because of its wide use in educational settings and its high potential for facilitating the management of complex personnel preparation efforts, the Discrepancy Evalution Model was selected for two years of field testing. Subsequently, a workshop, supportive materials, and a program of technical assistance were developed.

The Discrepancy Evaluation Model defines evaluation as the comparison of what is a performance, to an expectation of what should be, a standard.

The Discrepancy Evaluation Model seeks to provide information about educational programs to meet two purposes: improvement and assessment. The . . . model focuses on the program as a whole; it is not a model for teacher evaluation, nor for evaluating student performance, although both these activities can, and often do, take place within the scope of the general model. Like most models, the Discrepancy Evaluation Model is not value-free. It is based upon certain premises, the most important of which are stated below:

- Evaluation is essentially a constructive activity. In most cases, information must be collected to *improve* programs before valid information can be collected to *assess* them.
- Like education, evaluation is both an art and a science.
- Evaluation works best when there is broad participation in all evaluation activities, and when program staff function in an atmosphere where they feel a freedom to admit error, make revisions, and risk failure creatively.

The Discrepancy Evaluation Model defines "evaluation" as the comparison of what is, a performance, to an expectation of what should be, a standard.

If a difference is found to exist between the standard and the performance, this difference is known as a discrepancy. Discrepancies may be positive, where performance exceeds the standard, or negative, where performance is less than the standard. Whereas positive discrepancies are usually welcome, negative discrepancies generally cause concern. Negative discrepancies may be resolved in three ways: an unrealistic standard may be reformulated or redesigned; management may exert greater control over performance; or, if the discrepancy is unmanageable, a program may be terminated.[25]

The purposes, then, of the Research Evaluation Center's training program are to assist personnel preparation programs in creating designs that would:

- Yield information on the total effectiveness of the program.
- Provide the means for changing or improving the program.
- Develop the capacity for determining whether the program is meeting its objectives.
- Lead to the development of program standards.
- Provide a description of program activities and their sequence.[26]

The model progresses from description of goals to analysis and reporting of data.

The model provides for clearly stated goals and a description of program components that will achieve the goals, expressed as interdependent parts that include antecedent prerequisites, activities, intended outcomes, and their relationship to other program activities. Next, the focus is on evidence that a program has in fact operated successfully, e.g.:

- Did trainees meet their training objectives?
- Do trainees meet the needs of their profession?
- Were resources spent effectively?
- Have related programs been affected positively by this program?
- Have critical resources been obtained?
- Have critical preconditions been met?
- Are activities being carried out according to plan?
- Are interim objectives being met?

The method for collecting data relative to these concerns about successful program operation includes describing the information to be collected, devising procedures for collecting it, developing a data collection instrument, carrying out a data collection plan, and analyzing and reporting data.

Evaluation plans prepared by trained professionals receive better ratings from field reviewers.

After training had begun and the new proposals had arrived for fiscal 1975, we made a comparison among proposals submitted by people who had not received training, people who had received workshop training, and people who had received both workshop and clinic training by the Research Evaluation Center.[28] Reviewers' comments on these proposals revealed that evaluation plans prepared by trained professionals were significantly better than those submitted by untrained professionals (Table 7).

Equally important, Table 8 indicates that reviewers found a marked difference between *the total programs* proposed by trained and untrained professionals on all criteria except staff. In addition, the better overall proposals also had the superior evaluation designs. The implication is that evaluation training has enabled people to plan entire training programs more effectively. Our 1976 study replicated these findings, and, since over 500 program personnel have now received training in evaluation, we can only conclude that total program quality has been enhanced.

TABLE 7
Field Rater Comments on Evaluation Plans

Percentages of *Yeses* on Individual Evaluation Items by Treatment Groups for *Field Raters*

Variable	Control	Workshop	Workshop/ Clinic	X^2	p
N[1] =	104–112	61–65	71–77		
1. Evaluation methodology	56.8%	76.9%	79.2%	13.39	.001
2. Kinds of data collected	53.6%	69.2%	79.7%	13.87	.001
3. Criteria used to evaluate results	51.8%	68.3%	72.7%	9.79	.01
4. Procedures for assessing competencies	56.0%	76.6%	77.3%	12.36	.01
5. No. of grads prepared and placed by role	45.0%	75.8%	81.8%	31.56	.001
6. Position taken by grads	45.0%	74.2%	84.0%	32.02	.001
7. Graduate length of service	34.3%	60.7%	59.2%	15.58	.001
8. Graduates proficiencies as judged by employers	40.2%	67.7%	73.7%	24.63	.001
9. Method of assessing effective use of resources	44.5%	56.3%	57.5%	3.77	N.S.
10. Method for assessing impact on institution and community	33.0%	56.5%	49.3%	10.21	.01

1. Sample size varies due to missing data.

TABLE 8
Field Rater Comments on Total Programs

Results of One Way ANOVA by Variables for *Field Raters* Across Treatment Conditions[1]

	MEANS				
Variable	Control	Workshop	Workshop/ Clinic	F Ratio	Prob.
N =	104–112	61–65	71–77		
1. Ed. Significance Need	3.16	4.03	3.89	11.39	<.001
2. Ed. Significance Impact	2.93	3.75	3.83	12.48	<.001
3. Program Design Planning	2.87	3.52	3.82	10.91	<.001
4. Program Design Procedures	2.76	3.48	3.69	12.13	<.001
5. Program Design Staff	2.96	3.14	3.28	1.38	N.S.
6. Evaluation[2]	2.57	3.26	3.82	15.70	<.001
7. Support for Project	2.81	3.35	3.48	6.27	<.01
8. Evaluation Scale	4.46	6.65	7.00	15.31	<.001

1. With the exception of variable 5 (staff), significant differences between a combination of the workshop and workshop/clinic group compared with the control group were found using the Scheffé procedure.
2. Field raters also rated the workshop/clinic group significantly higher on overall evaluation than the workshop group, according to the Scheffé procedure.

Finally, Tables 9 and 10 show that 66.7 percent of proposals submitted by untrained staffs were disapproved by Division project officers, while 60.7 percent of these were disapproved by field readers. Project officers approved only 9.8 percent of such proposals, while field reviewers approved only 16.1 percent. Thus, it can be concluded that better evaluation plans get more federal dollars.

Better evaluation designs get more federal dollars.

TABLE 9
Funding Disposition by Project Officers

Results of Crosstabulation for Project Recommended Funding Disposition by Treatment Group for *Project Officers*

	GROUP			
Disposition	Control	Workshop	Workshop/ Clinic	
Funding Disapproval	66.7%	23.3%	17.2%	
Deferral	0	0	3.4%	
Provisional Acceptance	23.5%	43.3%	44.8%	
Approval	9.8%	33.3%	35.5%	
N =	51	30	29	110

$X^2 = 27.34$ d.f. = 6 $p < .001$

TABLE 10
Funding Disposition by Field Raters

Results of Crosstabulation for Project Recommended Funding Disposition by Treatment Group for *Field Raters*

	GROUP			
Disposition	Control	Workshop	Workshop/ Clinic	
Funding Disapproval	60.7%	24.6%	19.7%	
Deferral	7.1%	7.7%	3.9%	
Provisional Acceptance	16.1%	40.0%	50.0%	
Approval	16.1%	27.7%	26.3%	
N =	112	65	76	253

$X^2 = 46.13$ d.f. = 6 $p < .001$

The greatest need in evaluation planning that currently exists, according to our colleagues in the field, is that of selecting or constructing instruments to collect data that will answer evaluation questions. To help meet this need, the Evaluation Research Center has added clinics on instrumentation design, which

Instrumentation for data gathering is the greatest current need.

are now in progress. On the other hand, the writing of proposal designs, considered a prime need five years ago, is no longer seen as a critical issue in the field, and this indicates that the proper homework is being done on the fundamentals of evaluation planning. Obstacles continue to exist, however, in obtaining fiscal support for evaluation activities, in engaging faculty involvement in evaluation activities, in locating and using measurement expertise, in simply finding the time to carry out evaluation plans properly, in persuading decision-makers and faculty committees to use evaluation data, and in managing and organizing to implement and use evaluation for program improvement.

This year and in the future, the Division of Personnel Preparation will look seriously for reports of data that is collected.

The purposes and uses of collected data are current concerns of the Division of Personnel Preparation. Although more data are being collected now than ever before, programs are not yet reporting the data they are gathering. Without the use of this information for improvements and modifications of training programs, evaluation itself is pointless. Part of the answer lies in the fact that second-year continuation proposals must be submitted before program staffs can get a start on implementing their designs, but this explanation is, obviously, good for one year only. This year and in the future, the Division of Personnel Preparation will look seriously for reports of data that are collected, and how data are being used for course correction.

Our progress in evaluation over the past five years has been immense. Programs are far more evaluation conscious than ever before, evaluation plans are vastly improved, most programs include formal evaluation assignments among faculty and students, instruments are being designed, and more data are being collected. The task before us is the full reporting of that data, and adequate use of it for the purpose of constantly refining and upgrading programs of personnel preparation.

The Joint Dissemination Review Panel assures that dissemination of educational practices is matched by a guarantee that what is disseminated is exemplary.

Another purpose of data collection and reporting is the possibility of program validation by the Joint Dissemination Review Panel of the Office of Education and National Institute of Education. This 22-member panel has been in existence for four years, with the objective of assuring that the dissemination of educational methods is matched by a guarantee that what is disseminated is exemplary. By means of the Panel, when a division or bureau of the federal government says that a program, practice, or product is worthy of replication, the assertion will have something substantial behind it.[29]

The criteria that the Panel seeks in validating programs focus on three issues: "(1) is there evidence that anything important happened that is consistent with the stated claims, (2) that what happened is generalizable, and (3) can this credibly be attributed to the product or practice?"[30] In other words, there must be objective evidence that things were different after using the product or practice than they were before. If this evidence is conclusive and leads to validation, then the validated program is eligible for an Office of Education developer/demonstrator grant for the purposes of replication and outreach work.

No personnel preparation program has received validation by the Panel.

To date, no personnel preparation program has received validation by the Panel. However, we are now finding that more than a few of our programs are in fact collecting the kinds of data that would lend themselves to validation. Thus, we are spending considerable energy endeavoring to locate these programs, assist them in preparing for validation, and bringing to their attention the various possibilities for dissemination that exist for them.

The replication of exemplary programs, particularly in the inservice area, is much to be desired. The first step toward this goal is collection of information that will prove that our programs work. That proof rests with our expertise in evaluation, data collection, and data reporting.

The first step is the collection of information that will prove that our programs work.

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[23] *Code of federal regulations.* 45 CFR. Public Welfare, Parts 100–199, Chapter 1. Washington, D.C.: Department of Health, Education, and Welfare, Office of Education, 1976. (A bound copy of current regulations relating to grants and contracts may be purchased for $10.00 from the Superintendent of Documents, U. S. Government Printing Office, Washington, D. C. 20402.)

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[25] Yavorsky, D. K. *Discrepancy evaluation: A practitioner's guide.* Charlottesville: University of Virginia Evaluation Research Center, 1976, p. 5.

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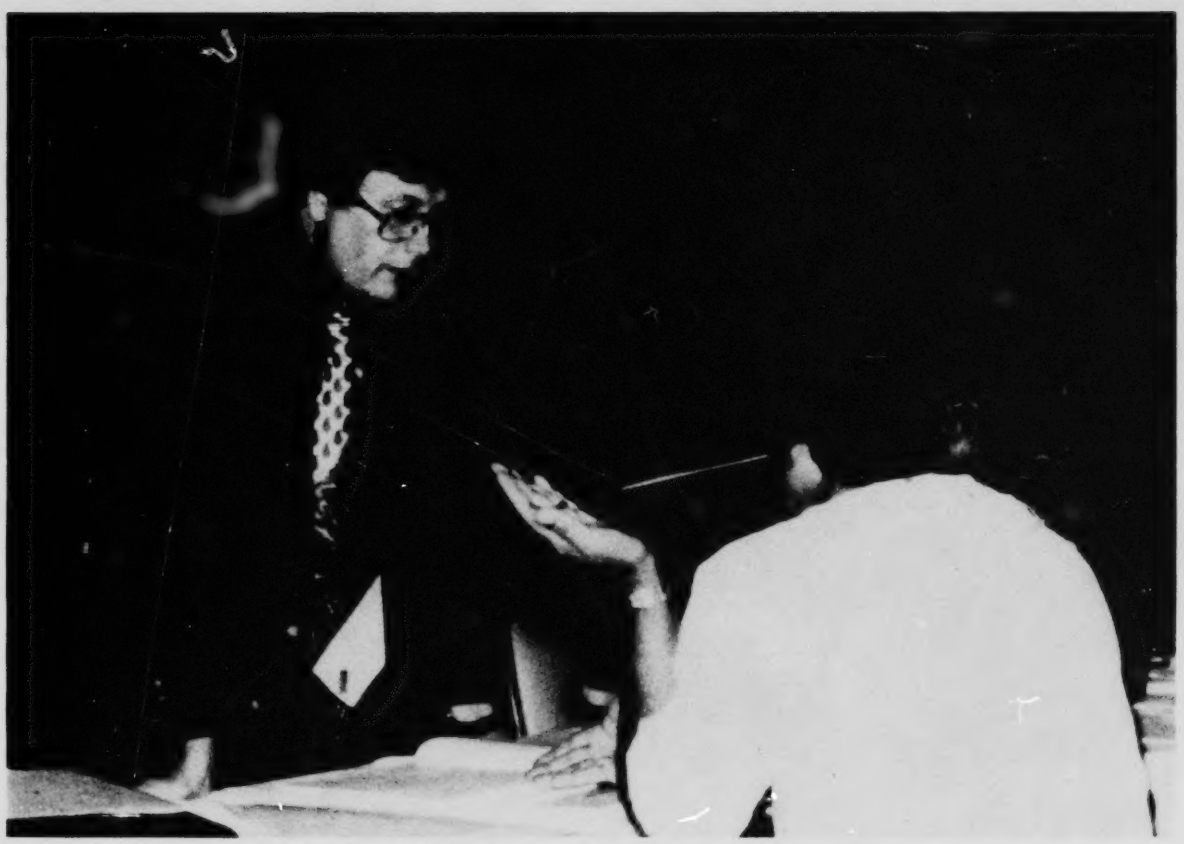

Chapter 6

DISSEMINATION

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Teacher Education/Special Education
University of New Mexico Dissemination Project
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TEACHER EDUCATION/Special Education is a national project designed to develop four levels of intercommunication on professional preparation programs. Funded as a Special Project by the Division of Personnel Preparation, Teacher Education/Special Education was established to contribute to mutual awareness, contact, and transfer of expertise among inservice and preservice trainers. A companion purpose is to provide the field with a workable model by defining and performing a set of reciprocal tasks that illustrate the concept of dissemination in terms of:

Dissemination may be defined as a set of interlocking tasks.

- Exchange
- Awareness
- Knowledge
- Skill

The project's goals are similar to the objectives of this chapter: (1) to outline the services and products we offer to the training profession, (2) to describe these as interlocking levels of activity and, thus, (3) to translate dissemination into concrete terms that others might use for their own purposes.

The first level of activity, exchange, represents continuously identifying and reaching out to individuals and groups whose interests are similar to those of the project. Successful programs do not operate in isolation. In fact, any program may be regarded as the *actualization* of all of the resources available to it and, simultaneously, as a *potential* that can help other programs to become actualized. The fundamental step in achieving this pivotal position is an exchange system that will lead to contacts, liaisons, and interactions with all possible users and resources.

Exchange means liaisons, contacts, and interactions with all possible users and resources.

Within this project, exchange has included:

- The identification of approximately 3000 target users of training information and resources that this project, as well as training programs, might employ. These include: college and university departments; state education agencies; state directors of special education; personnel of regional resource centers; state facilitators of the National Diffusion Network; dissemination representatives of the Council of Chief State School Officers; organizations related to the goals of special education and personnel preparation; national dissemination activities, networks, and agencies; Congressional subcommittees involved in the funding of training programs; publishers and commercial developers; and a variety of individuals and groups who have made contact with us.

- An ongoing assessment that incorporates individual user comments in order to develop and distribute resource information that best answers the most predominant questions and needs.

- A modest information clearinghouse operated on a personalized basis. Through this service, potential users of information, who make inquiries about specific topics, receive personal letters or telephone calls that put them in touch with resources that may provide answers.

- Contact with various national and state organizations so as to collaborate with them at points of mutual interest and to make use of their print media and conference vehicles as resources for distributing information about training programs and about this project and, thereby, to reach more users.

- Liaison with dissemination activities sponsored by various agencies of the federal government in an effort to introduce both training programs and special education into national information and diffusion networks and to users in the field.

- The identification of major inservice and preservice training needs on a state-by-state basis, so that users of training programs and products may be linked with potential sources of the training they seek.

- Liaison with contractors of the Marketing Unit of the Bureau of Education for the Handicapped.

- Productive relationships with publishers and producers of educational materials, who can act as developmental and commercial resources for trainers, and as links to users in the field.

Exchange activities become greater than the sum of their parts; they form a unified process of give and take, judgment and action, stimulus and response.

These exchange activities are the groundwork for all other project activities. First, they provide us with users, audiences, and participants. Second, they lead to decisions as to the kinds of information that should be disseminated. Third, they provide vehicles for presenting information. Fourth, exchange activities become greater than the sum of their parts; they form a unified process of give and take, judgment and action, stimulus and response, forming the matrix from which programs may grow.

At the second level, awareness, we are concerned with supplying general information about training programs to both users and resources. To do so, we retrieve information on categories of professional preparation programs, develop a variety of print materials on these topics, and send these materials three to four times a year as a large package. The most extensive documents in these packages are the consumer's guides to personnel preparation, so called because they provide a means for users to compare various aspects of large numbers of programs. Already in distribution are guides on the training of paraprofessionals[31] and on the inservice training of regular educators in special education.[32] Two additional guides are in preparation for 1977–78: one on the training of personnel for vocational education of the handicapped; the other on the training of personnel in physical education and recreation for the handicapped. (Topics for 1978–79 will be established on the basis of the ongoing needs assessment.)

The awareness level is concerned with supplying general information.

In addition to consumer's guides of 70 to 100 pages, the awareness level includes:

- Short directories that list, without narrative, specified groups of projects and complete information on how to contact their directors, e.g., a list of all

Special Projects ever funded by the Division of Personnel Preparation,[33] a list of technical assistance systems supported by the Bureau of Education for the Handicapped.[34]

- Lists of dissemination resources useful to professional preparation programs.
- Data displays showing training activities on a state-by-state basis.
- The publication of *Forum*, individual position papers on topics pertinent to professional preparation,[35] with replies from professionals in the field.
- Brief news sheets and announcements concerning training programs and dissemination activities.
- Analyses of small groups of programs, such as selected special projects supported by the Division of Personnel Preparation.
- Short lists of questions posed by professionals in the field, so that others may call or write to them to provide the requested assistance.

Our publications are attempts to portray the state of the art and, thus, we welcome program information and the expression of needs from all professionals.

Two things remain to be said about this project's work at the awareness level. First, although consumer's guides and other publications will always include projects funded by the Division of Personnel Preparation, our scope is not limited to dissemination of federally funded programs. Rather, our publications are attempts to portray the state of the art in various categories of professional preparation. Therefore, we make every effort to locate and include programs that do not receive federal funds. Much of this identification occurs at the exchange level, through contacts with organizations and clearinghouses, and we also welcome individual program descriptions sent by training personnel in the field. Second, we establish our topics according to the professional needs we are able to determine and, again, individual opinion can help to dictate our future directions.

At the knowledge level, project personnel may author or present information, may encourage or assist others in doing so, and may collaborate with other groups which are producing knowledge for the field.

The knowledge level is the third stratum of dissemination. Here the objective is to provide avenues whereby people may learn, gain insights, and contribute to the production of materials and stimulation of processes important to the enhancement of professional preparation. The knowledge level includes the preparation of articles and full-length publications, conference presentations, workshops, faculty and student seminars, and specially arranged miniconferences. Project personnel may author or present information, may encourage or assist others in doing so, and may collaborate with other groups which are producing knowledge for the field.

Categorical information gathered for publications at the awareness level is given additional depth at the knowledge level through adaptation to journal articles and other publications that will reach extended segments of the special education field. Thus, to complement the consumer's guide on the training of paraprofessionals, an article on that subject was published,[36] and, in conjunction with the consumer's guide on inservice training, another article will appear.[37] This project will also produce a series of articles on dissemination, the first of which will appear in the *Review* of the American Association for the Education of the Severely/Profoundly Handicapped.[38] In addition, there has been collaboration between that Association and this project in the production of a full-length document on the preparation of personnel to serve the severely and profoundly handicapped.[39] Members of the project staff are currently

collaborating with other individuals and groups on publications and materials relevant to professional preparation.

Conference presentations center largely on making a wide range of professionals aware of dissemination practices and resources and, toward that end, an audio-visual presentation is in production. Project personnel also participate with other professionals in presenting insights into the state of the art and current needs in various areas of professional preparation. On a more personalized level, staff members visit training sites and discuss specific dissemination designs with faculty and staff, and also present seminars on dissemination to student groups.

One objective is to sponsor a small conference of teacher trainers who would commit themselves as a group to the development of some of the products, programs, or processes they see as needed in their area of special education.

Another objective is to sponsor a small, task-oriented conference of teacher trainers who would commit themselves as a group to the development of some of the products, programs, or processes they see as needed in their area of special education. This conference, now in the planning stages, would involve the identification of approximately 30 professionals who would participate in advance to determine key areas that need development, would attend the conference for the specific purpose of working in small groups to begin plans for developing such products and processes, and would take this development work to completion as a task force. Cooperation from this project would include: sponsorship of the conference and responsibility for coordinating advance activities and liaison work; incorporation of a few publishers or product developers into the task groups to give advice and guidance on production factors, costs, and the like; management and services in design, editing, and general production; full-scale dissemination of the effort and, eventually, of the products or programs developed by the task groups. The entire purpose of the miniconference would be to fulfill and exemplify one aspect of dissemination: that of judiciously providing the materials or processes that are most needed in the field and seeing that professionals have access to them. If professionals from the field will provide the substance, this project will provide the structures.

The skill level represents the transfer of exemplary programs to meet inservice or preservice needs.

The final dissemination level, skill, represents efforts to transfer exemplary programs or their components to meet inservice and preservice needs that have been identified at the exchange level. Here the determination of excellence rests with data that will show that programs do, in fact, work. Also important are issues of practicality, cost effectiveness, transportability, and marketability in meeting established training needs. For federally funded programs, the means for making these determinations is the Joint Dissemination Review Panel of the Office of Education and the National Institute of Education.

Although this project is not directly involved in validation per se, we are continuously seeking and identifying programs whose data might lead to validation. We also offer technical assistance to such programs in the development of the displays and presentations that must be presented to the Joint Dissemination Review Panel. When programs are validated or otherwise determined to be exemplary, this project offers a number of middleman services to help program personnel to apply for replication funds, structure their programs for transfer, develop and package materials, identify markets for their programs, and contact resources and users.

The best way to proceed with dissemination, validation, verification, and replication is to start at the beginning of the program, not at its conclusion. Therefore, this project also offers long-term assistance to training programs in

creating dissemination designs and initiating the data collection that can lead to validation.

The bottom line of dissemination, indeed its entire reason for being, is to ensure that the field can learn enough about programs in general to select for replication those that are clearly superior in their capacity to make positive changes in trainees and in children. To accomplish this, providers of services and training should understand enough about dissemination to create needed programs, document their effectiveness, and reach their potential users. At the same time, potential users must understand what is developing and must have a credible means for separating the wheat from the chaff. This is what dissemination and the efforts of this project are all about.

The bottom line is to ensure that the field can learn enough about programs in general to select for replication those that are clearly superior.

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CURRENT PROCEDURES AND ISSUES IN GRANT ADMINISTRATION

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Division of Personnel Preparation
Bureau of Education for the Handicapped

CERTAIN ISSUES and concerns relate to the administration of the Division of Personnel Preparation's grant program. An understanding of these points by professionals in the field will not only assist them in the proper execution of proposals and funded projects, but will also assist Division personnel in the processing, review, and approval of applications. Although the proposal packet contains detailed instructions for completing the forms involved, there are some questions that arise repeatedly, as well as some mutual concerns about specific parts of the proposal format. These can best be answered in this chapter by addressing the following topics: continuation applications vs. new competing applications; selected details related to grant application; budget revision; changes in key personnel; carry-over; no-cost time extension; making public all policies on stipend awards; de-emphasis on stipends; regulations for Section 504 of Public Law 93-112.

An understanding of points related to the Division's administrative policies will assist professionals in the execution of proposals and funded projects.

1. Non-competing vs. new competing applications. The Division of Personnel Preparation funds two types of grant applications: non-competing continuations and new competing applications. The Grant Award of Notification indicates whether the grant is in the first, second, or final budget period. In the past, grantees with non-competing continuations have been able to submit new subcomponents for funding consideration, along with the previously approved subcomponents. Beginning with fiscal 1978–79, this policy will be discontinued. In other words, non-competing continuation grantees will be able to apply only for those subcomponents that were approved the previous year, and for funds within the range previously approved.

Grantees with noncompeting continuations may apply only for those subcomponents that were approved the previous year, and for funds within the range previously approved.

If an agency has a non-competing application and wishes to apply for funds to support new or additional activities, it must submit a separate application for those activities, and that application will be considered as a new competing application. If a grantee uses a non-competing application to request funds for new activities not previously approved, these activities will be disapproved as inappropriate for a non-competing continuation application. A non-competing grantee should anticipate a decrease in fiscal 1978 funds commensurate with any fiscal 1977 one-year-only funds.

Requests for funding of new or additional activities must be submitted as a separate application.

2. Details related to grant application. The face sheet of the proposal packet (Standard Form 424 of OE Forms 9037 and 9047), as shown on Figure 2, was designed by the Office of Management and Budget to collect information, some of which is quite important to the Division of Personnel Preparation. In order that proposals may show this information clearly, a few details are necessary beyond the instructions presented in the proposal package.

• Item 4h. The fourth section of the face sheet concerns information that the Division uses to contact project personnel. Thus, in item 4h, it is essential that the name of the project director or principal investigator be entered. The name of the certifying representative should *not* appear here, but should be shown in item 23. If the correct person is not identified in item 4h, then the correct name will not appear on the Division's computerized mailing list and correspondence will not be properly directed.

The Division of Personnel Preparation receives approximately 1400 proposals each year.

• Item 7. The Division receives approximately 1400 proposals each year, and these are processed by the Application Control Center, which transfers them to tracks that account for expenditures. Those tracks are directly related to the information presented in item 7 and, in many cases, the various project titles submitted from the field have created difficulties in determining where proposals fit into budget categories. Therefore, in item 7, the first words that appear should define the type of proposal in one of the following specific terms:

—Special Project
—Program Assistance Grant
—Regular Education Preservice
—Regular Education Inservice
—Doctoral Program, Visually Handicapped

Projects may, of course, devise their own descriptive titles, but these should be written in parentheses after one of the above titles has been entered.

The actual proposal form is composed of a set of tables: OE Form 9047 for colleges and universities, and a similar OE Form 9037 for state and local governments. Tables 1 and 2 of OE Form 9047 are to be completed only for new grant applications and not for continuation grants, unless a change of emphasis or modification needs to be reported. When preparing a grant application, the most logical way to proceed is to prepare Table 1, then Table 2, then the budget categories and summary, and finally Table 3. (See Figures 3 through 7.)

The Division's budget from Congress is divided into categories that must be specified by applicants.

The first table, the Preparation Program Profile (shown as Figure 3), establishes major components and subcomponents and thereby sets up the framework of the total program. The more subcomponents, the more complex the program and the greater the responsibility—and the more difficult the completion of the application. Column d of this table is of exceeding importance to the Division, because it indicates the priority (e.g., general special education, early childhood education, paraprofessionals, and so forth) that the program addresses. The Division's budget from Congress is divided into categories of funding that must be specified by applicants and by the Bureau. In the proposal packet, these categories are listed on the reverse of Table 1. Applicants may respond to more than one category. For example, an early childhood training program might concentrate on the severely handicapped, thus answering two priorities, or a program might address both vocational education and the training of parents. In any event, column d must specifically include one or more of these priority categories.

The second table, Preparation Program Staff Profile (as shown on Figure 4), shows the assignments of personnel to implement each subcomponent established in Table 1. Thus, there should be a clear relationship between these two tables. Budget information appears on two sheets: Section A: Budget, and Section B: Budget Summary. On these forms, the components shown on Table 1 and the personnel listed on Table 2 are cost analyzed.

The third table, Report of Project Graduates for Academic Year (as shown on Figure 5), is crucial to the Division because it displays numbers of students graduated and their job placement. In view of the emphasis on manpower planning, as well as continuing news about teacher surpluses, we need to know how many people are being prepared in each priority area, so as to cut back where surpluses are really occurring.

Accurate reporting of project graduates will prevent the perpetuation of teacher surpluses.

All remaining items on the face sheet and proposal form must, of course, be completed, and a narrative must be written. The foregoing information has pointed out those areas that need particularly careful attention from proposal writers to ensure that applications can be processed.

3. Budget revision. The Division receives many questions about the procedures for making budget revisions and minor deviations in grants. The regulations[40,41] outline two different sets of procedures: the first pertaining only to state and local government grantees, paragraph 100a.29(a), and the second pertaining to all other grantees, paragraph 100a.29(b). Both sets of procedures spell out three instances which require prior approval of changes by all grantees:

Procedures for making budget revisions and minor deviations in grants vary according to the recipient of the grant.

- No funds may be moved into a budget line item which had not previously been a budget line item approved for the grant by the U. S. Office of Education.
- Even though the line item "equipment" may have been previously approved, each piece of equipment has to be approved by the U. S. Office of Education before purchase.
- No foreign travel is authorized under the grant unless prior approval is received from the grants officer. (Travel between the United States and Guam, American Samoa, Puerto Rico, the U. S. Virgin Islands, the Canal Zone, the Trust Territories, and Canada is not considered foreign travel.)

Certain other procedures apply specifically to state and local government recipients of grants. For non-construction grants and contracts, state and local governments must promptly request prior approval for budget revisions from the Commissioner of Education whenever:

State and local government grantees must use specific procedures for budget revision.

- The revision results from changes in the scope of the objectives of the project;
- The revision indicates the need for additional federal funding;
- The budget is over $100,000 and the cumulative amount of transfers among direct cost object class categories (budget line items) exceeds or is expected to exceed $10,000, or 5 percent of the budget, whichever is greater. The same criteria apply to the cumulative amount of transfers among projects, functions, and activities when budgeted separately for a grant or contract, except that no transfer is permissible which would cause any federal appropriation, or part thereof, to be used for purposes other than those intended;
- The budget is $100,000 or less, and the cumulative amount of transfers among direct cost object class categories (budget line items) exceeds or is expected to exceed 5 percent of the budget. The same criteria apply to the cumulative amount of transfers among projects, functions, and activities when budgeted separately for a grant or contract, except that no transfer is permissible which would cause any federal appropriation or part thereof, to be used for purposes other than those intended;

- The revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs; or
- The revisions pertain to the addition of items requiring prior approval in accordance with the provisions of Appendix B of the General Provisions.[42]

Budget revisions by state or local government grantees which do not require approval by the Commissioner include:

- The use of the recipient's own funds in furtherance of project objectives over and above the recipient minimum share (if any) included in the approved budget.
- The transfer of amounts budgeted for direct costs to absorb authorized increases in indirect costs.

Colleges, universities, and other non-profit agencies follow a different set of procedures.

When the recipient of a grant is other than a state or local government (i.e., college, university, other nonprofit agency), minor deviations are permitted without an approved amendment or revision when:

- They do not result in expenditures in excess of the total amount granted.
- There is not any material change in the content or administration of the approved project.
- Expenditures are otherwise made in accordance with, and for kinds of expenditures authorized in, the approved application.

When permission is required, under either set of procedures, to make a budget revision or minor deviation, a letter of request signed by the certifying representative and the project director must be sent to the appropriate Division project officer for processing. The request should be sent at least 30 days before the change is to be made, and the letter should indicate the project number, the grant number, the originally approved line item budget, the proposed line item budget, and a justification of the proposed change. (The grant's project number can be found in cell 7C of the Notification of Grant Award; it will always start with the number 451. The grant number, which always begins with the letter G, appears in cell 6 of the Notification of Grant Award.) Letters requesting a budget revision should be addressed to the project officer at:

Division of Personnel Preparation
Bureau of Education for the Handicapped
U. S. Office of Education
400 Maryland Avenue, SW (Donohoe 4805)
Washington, D. C. 20202

A final decision on the request for change will be issued by the Grant and Procurement Division of the U. S. Office of Education

Major personnel changes, and accompanying program changes, must be reported in detail.

4. Changes in key personnel. The *Federal Register* indicates what is required of grantees when there is a change in key personnel, as follows:

> If for any reason it becomes necessary to substitute the project director or other key professional staff designated in the grant or contract, the recipient shall provide timely written notification to the Commissioner of the substitution. Such written notification shall include the name and qualifications of the successor.[43]

If program changes result from changes in key personnel, these should also be explained in a concise narrative.

The letter indicating a personnel change should be signed by the certifying representative and project director and sent to the appropriate project officer of the Division of Personnel Preparation. The letter should indicate the project number, grant number, the names of the key person or persons leaving, and the name of replacements with a vita for each.

5. Carry-over. Carry-over occurs when activities that could not be completed during one budget period are moved into the next budget period, with an accompanying carry-over of funds to conduct those activities. Carry-over may move some activities from a first budget period to a second budget period, or from a second to a third budget period—but it may not be done at the end of a third or a final budget period. (This latter type of request is called a no-cost time extension.)

Carry-over means the transfer of some program activities from one budget period to the next, but not beyond the final budget period.

A grantee may submit a carry-over request up to 90 days following the end of the budget period. In that case, however, Division staff would probably recommend approval of the carry-over with a deletion of a like amount of funding for the current grant. Ideally, to process such a request in sufficient time, the Division should have the request by the first of March each year. The request itself should contain:

- A letter cosigned by the certifying representative and project director.
- A detailed outline of the activities that were not carried out, the reasons for their not being conducted, and a budget outline for the activities to be carried out and dates for their completion.
- Indication of the assigned project number and grant number.

This material should be sent to the appropriate project officer of the Division of Personnel Preparation, who will submit it to the Grant and Procurement Management Division, U. S. Office of Education, for final action. If the request is approved, a revised Notification of Grant Award will be issued to document the carry-over.

6. No-cost time extension. This type of extension may be requested by a grantee in the final budget period, and may be requested only to complete activities which could not be completed during the approved budget period. A carry-over of funds may be associated with those activities.

A no-cost time extension transfers some program activities beyond the final budget period.

Requests for no-cost time extensions must be received by the Division of Personnel Preparation by March 1 of the final budget period. If a request is submitted later, the grantee runs the risk of not receiving approval in time to conduct the activities. The request must contain:

- A letter cosigned by the certifying representative and the project director.
- A description of activities to be carried out, with reasons as to why they could not be carried out during the approved budget period.
- Proposed budget and time lines for completion.
- The project number and grant number.

The letter should be sent to the appropriate project officer of the Division of Personnel Preparation. The procedures for review and recommendation are the same as those for carry-over of funds.

7. Making public all policies on stipend awards. A problem that constantly arises both in review of applications and in project officers' discussions with faculty and students of training programs is that no one seems to know the policy used in awarding stipends and in determining stipend amounts.

Policies for awarding stipends and determining their amounts have not been adequately defined.

Therefore, each grantee who plans to award stipends must describe in his application, and must make public to faculty and students, the policy regarding selection of stipend recipients and the policy used for determining the amount of stipends.

A number of sources of student assistance are available outside the Bureau of Education for the Handicapped.

8. De-emphasis on stipends. The Division of Personnel Preparation will be decreasing its emphasis on stipends, particularly at the undergraduate level, in response to both Congress and the Administration. Undergraduates are eligible for at least five major financial aid programs of the U. S. Office of Education:

- Basic Educational Opportunity Grant Program
- National Direct Student Loan Program
- Supplemental Educational Opportunity Grant
- College Work Study Program
- Guaranteed Student Loan Program

These programs are described in a booklet entitled "HEW Fact Sheet: Five Federal Financial Aid Programs."[44]

Any request for stipends on a grant application to the Division of Personnel Preparation must be fully documented as to need. If a program is specifically designed to meet a recognized regional need and is funded by the Division for that purpose (for example, training programs in the area of the visually handicapped), then stipends may be necessary to assist in the payment of out-of-state tuition. However, even that kind of need must be fully documented.

9. Regulations for section 504 of public law 93-112. Section 504 of the Rehabilitation Act of 1973 states that:

> No otherwise qualified handicapped individual . . . shall, solely by the reason of his/her handicap, be excluded from the participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.[45]

A number of guides to the implementation of Section 504 are being developed.

The Office for Civil Rights has the primary responsibility for enforcing Section 504 regulations. In the near future, the Office for Civil Rights will develop or cause to be developed a number of products that will serve as guides for the implementation of Section 504, including:

- Preschool, elementary, secondary, and post-secondary education self-evaluation instruments to be used by the educational institution to focus their attention on the major programs which may need remedial attention as a result of Section 504.
- A post-secondary admissions policy review instrument, covering such areas as testing, recruitment, quotas, pre-admission inquiries, admissions criteria, and so on.
- An elementary and secondary education personnel resource directory, which will identify the training resources that elementary and secondary educational institutions may utilize to learn techniques for educating handicapped students.
- An employment self-evaluation instrument, addressing employment practices.
- A system for facilitating program accessibility in higher education: A computerized system and a derivative manual system for enabling institutions with limited accessible space to accommodate students with impaired mobility.

As part of all applications to the Office of Education, we must now have the assurance of compliance with Section 504 of the Rehabilitation Act of 1973, as amended. Sections 502 and 503 of this Act are also of interest to professionals involved in personnel preparation. Section 502 requires the elimination of architectural barriers that would make buildings inaccessible to the handicapped, and also creates the Architectural and Transportation Barriers Compliance Board. Section 503 states that any federal contractor whose contract exceeds $2,500 must take affirmative action to employ the handicapped.

Section 504 itself will have a direct effect on training programs in terms of recruitment. Many professionals have developed recruitment literature that is unique to their programs. The regulations indicate that, if a recipient of federal funds publishes or uses recruitment materials or publications containing information made available to participants, beneficiaries, applicants, or employees, it shall include in those materials a statement that the agency does not discriminate on the basis of handicap in admission, access to, treatment in, or employment in its programs or activities.

Compliance with Section 504 must be based on methods that offer programs and activities to handicapped persons in the most integrated appropriate setting.

Moreover, recipients must operate programs or activities in such a manner that, when viewed in their entirety, they are readily accessible to handicapped persons. This does not mean that recipients must make each facility or every part of a facility accessible to and usable by handicapped persons. Compliance may be accomplished by redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternative accessible sites, alteration of existing facilities, and construction of new facilities in conformance with the requirements—or any other method that results in making the program accessible. In selecting a method for complying, a recipient must give priority to the methods that offer programs and activities to handicapped persons in the most integrated appropriate setting. These requirements also apply to the renting or leasing of facilities, a particularly important consideration to those who may rent the use of educational facilities, hotels, motels, and the like to conduct inservice training and workshops. Further information on this topic may be found in a booklet entitled *Barrier Free Meetings: A Guide for Professional Associations.*[46] (Specific questions concerning your program or agency in relation to Section 504 may be directed to your Regional Director for Civil Rights. Table 11 contains a list of these Regional Directors.)

In 1973, we said in our application packet that, as advocates for the handicapped, it would seem proper for all of us to review the various programs and activities in which we are engaged in order to: (1) initiate the development of resources, including personnel and environmental, and (2) make programmatic changes so as to be in compliance with Section 504 of the Rehabilitation Act of 1973. Today we must exert even more influence as advocates within our own institutions to bring about compliance.

One of the Division's evaluation criteria is a description of the extent to which present and former students, employing agencies (school districts, state agencies, and the like), and individuals (parents, practicing teachers, and others) are involved in program planning, implementation, and evaluation. We must have the active involvement of handicapped individuals in this work, as well. We need to plan, too, for greater use of parents, particularly parents of handicapped individuals, throughout the training program.

For too long, the able bodied have taught able-bodied teacher trainers to train able-bodied students to teach persons who have handicaps.

As advocates, we should engage in active recruitment of persons who have handicaps so that they may become part of our training programs. For too long the able bodied have taught able-bodied teacher trainers to train able-bodied students to teach persons who have handicaps. Many handicapped individuals have already entered the field as professionals, with great success. While we continue to encourage their sensitive participation, we must also assure that our training sites are conducive to their entry into our programs.

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[40] Part III. Administrative and fiscal requirements. *Federal Register, 38* (213), Tuesday, November 6, 1973.

[41] *Code of federal regulations.* 45 CFR. Public welfare, Parts 100–199, Chapter 1. Washington, D. C: Department of Health, Education, and Welfare, Office of Education, 1976. (A bound copy of current regulations relating to grants and contracts may be purchased for $10.00 from the Superintendent of Documents, U. S. Government Printing Office, Washington, D. C. 20402.)

[42] *Code of federal regulations.* 45 CFR. Public welfare, Parts 100–199, Chapter 1. Washington, D. C: Department of Health, Education, and Welfare, Office of Education, 1976.

[43] Part III. Administrative and fiscal requirements. *Federal Register, 38* (213), Tuesday, November 6, 1973.

[44] HEW fact sheet: Five federal financial aid programs. Washington, D. C: Department of Health, Education, and Welfare. (Order from the Director, Guaranteed Student Loans, U. S. Office of Education, 400 Maryland Avenue, Southwest—ROB 4661, Washington, D. C. 20202.)

[45] Regulations for Section 504 of the Rehabilitation Act of 1973. *Federal Register, 42* (86), May 4, 1977. (Order from David S. Tatel, Director, Office for Civil Rights, HEW Building North, 330 Independence Avenue, Southwest, Washington, D. C. 20005.)

[46] *Barrier-free meetings: A guide for professional associations.* Washington, D. C: American Association for the Advancement of Science, 1976. (Order from the Association, at 1515 Massachusetts Avenue, Northwest, Washington, D. C. 20202.)

OMB Approval No. 29-R0218

FEDERAL ASSISTANCE

1. TYPE OF ACTION (Mark appropriate box)	☐ PREAPPLICATION ☐ APPLICATION ☐ NOTIFICATION OF INTENT (Opt.) ☐ REPORT OF FEDERAL ACTION	2. APPLICANT'S APPLICATION a. NUMBER / b. DATE Year month day 19	3. STATE APPLICATION IDENTIFIER a. NUMBER / b. DATE ASSIGNED Year month day 19
Leave Blank			

SECTION I—APPLICANT/RECIPIENT DATA

4. LEGAL APPLICANT/RECIPIENT
a. Applicant Name :
b. Organization Unit :
c. Street/P.O. Box :
d. City : e. County :
f. State : g. ZIP Code :
h. Contact Person (Name & telephone No.) :

5. FEDERAL EMPLOYER IDENTIFICATION NO.

6. PROGRAM (From Federal Catalog) a. NUMBER 13.451 b. TITLE Handicapped Personnel Preparation

7. TITLE AND DESCRIPTION OF APPLICANT'S PROJECT

8. TYPE OF APPLICANT/RECIPIENT
A–State H–Community Action Agency
B–Interstate I–Higher Educational Institution
C–Substate District J–Indian Tribe
D–County K–Other (Specify):
E–City
F–School District
G–Special Purpose District
Enter appropriate letter ☐

9. TYPE OF ASSISTANCE
A–Basic Grant D–Insurance
B–Supplemental Grant E–Other
C–Loan
Enter appropriate letter(s) A

10. AREA OF PROJECT IMPACT (Names of cities, counties, States, etc.)

11. ESTIMATED NUMBER OF PERSONS BENEFITING

12. TYPE OF APPLICATION
A–New C–Revision E–Augmentation
B–Renewal D–Continuation
Enter appropriate letter ☐

13. PROPOSED FUNDING

a. FEDERAL	$ .00
b. APPLICANT	.00
c. STATE	.00
d. LOCAL	.00
e. OTHER	.00
f. TOTAL	$ .00

14. CONGRESSIONAL DISTRICTS OF:
a. APPLICANT / b. PROJECT

15. TYPE OF CHANGE (For 11e or 11e)
A–Increase Dollars F–Other (Specify):
B–Decrease Dollars
C–Increase Duration
D–Decrease Duration
E–Cancellation
Enter appropriate letter(s) ☐☐☐

16. PROJECT START DATE Year month day 19

17. PROJECT DURATION Months

18. ESTIMATED DATE TO BE SUBMITTED TO FEDERAL AGENCY Year month day 19

15. EXISTING FEDERAL IDENTIFICATION NUMBER

20. FEDERAL AGENCY TO RECEIVE REQUEST (Name, City, State, ZIP code)
U.S. Office of Education, Application Control Center, Washington, D.C. 20202

21. REMARKS ADDED ☐ Yes ☐ No

SECTION II—CERTIFICATION

22. THE APPLICANT CERTIFIES THAT
a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.
b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:

	No response	Response attached
(1)	☐	☐
(2)	☐	☐
(3)	☐	☐

23. CERTIFYING REPRESENTATIVE a. TYPED NAME AND TITLE / b. SIGNATURE / c. DATE SIGNED Year month day 19

SECTION III—FEDERAL AGENCY ACTION

24. AGENCY NAME

25. APPLICATION RECEIVED Year month day 19

26. ORGANIZATIONAL UNIT

27. ADMINISTRATIVE OFFICE

28. FEDERAL APPLICATION IDENTIFICATION

29. ADDRESS

30. FEDERAL GRANT IDENTIFICATION

31. ACTION TAKEN
☐ a. AWARDED
☐ b. REJECTED
☐ c. RETURNED FOR AMENDMENT
☐ d. DEFERRED
☐ e. WITHDRAWN

32. FUNDING

a. FEDERAL	$ .00
b. APPLICANT	.00
c. STATE	.00
d. LOCAL	.00
e. OTHER	.00
f. TOTAL	$ .00

33. ACTION DATE Year month day 19

34. STARTING DATE Year month day 19

35. CONTACT FOR ADDITIONAL INFORMATION (Name and telephone number)

36. ENDING DATE Year month day 19

37. REMARKS ADDED ☐ Yes ☐ No

38. FEDERAL AGENCY A-95 ACTION
a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part I, OMB Circular A-95, it has been or is being made.
b. FEDERAL AGENCY A-95 OFFICIAL (Name and telephone no.)

424-101 (OE Form 9047, 7/77)

STANDARD FORM 424 PAGE 1 (10-75)
Prescribed by GSA, Federal Management Circular 74-7

Figure 2. OE Form 9047. Standard Form 424.
(Face sheet of proposal package)

TABLE 1. PREPARATION PROGRAM PROFILE
(See reverse for instructions)

NAME OF APPLICANT

PROJECT SUB-COMPONENTS-TITLE (a)	STATE PERSONNEL SERVICE CATEGORY TITLE (b)	OE-CREE LEVEL FRIL HRS. (c)	OEN TRNG CATE-GOR-IES (d)	AREAS OF DISABILITY ADDRESSED BY EACH SUB-COMPONENT. PLACE A CHECK (✓) IN THE APPROPRIATE COLUMN(S) (e)														ENROLLMENT (f)							
				All Disab.	Trainable	Educable	Ortho.	Visual	Deaf	Hard of Hearing	Speech	Emot. Dist.	Learning	Multi-Handi.	Other	CURRENT 19__		PROJ'D 19__		PROJ'D 19__		PROJ'D 19__	
																TOTAL no.	Grant Supp'd No.	TOTAL no.	Grant Supp'd No.	TOTAL no.	Grant Supp'd No.	TOTAL no.	Grant Supp'd No.
1.0																							
2.0																							
3.0																							
4.0																							
5.0																							
6.0																							
7.0																							
8.0																							
9.0																							
10.0																							
01	02	Check areas of disability for all practices combined →														TOTAL ENROLLMENT							

Figure 3. OE Form 9047
(Table 1. Preparation Program Profile)

TABLE 2. PREPARATION PROGRAM STAFF PROFILE
(See reverse for instructions)

NAME OF APPLICANT

FACULTY/STAFF POSITION TITLE (a)	HIGHEST DEGREE (b)	ACADEMIC RANK (c)	TENURE (Y, N) (d)	FTE ALLOCATED OVER ALL PROJECT SUB-COMPONENTS (e)										TOTAL (FTE)	TOTAL (Salary charged to this Grant) (f)
				1.0	2.0	3.0	4.0	5.0	6.0	7.0	8.0	9.0	10.0		
		TOTAL													

OE FORM 9047, 7/77

Figure 4. OE Form 9047
(Table 2. Preparation Program Staff Profile)

TABLE 3. REPORT OF PROJECT GRADUATES FOR ACADEMIC YEAR_____ (See reverse for instructions)

NAME OF APPLICANT

PROJECT SUB-COMPONENTS-TITLE (a)	OEH TRAINING CATEGORY (b)	NO. OF STUDENTS GRADUATED (c)	NO. OF STUDENTS CERTIFIED (d)	NUMBER OF STUDENTS PLACED IN EACH SETTING (e)																TOTAL (Students placed in other settings) (f)	
				SPECIAL EDUCATION												GENERAL					
				ECP	ECO	PSE	PSS	RSC	SDS	H/C	CAS	PPA	C/U	STA	01	02	GED	03			
1.0																					GRANT SUPPORTED
																					OTHER
2.0																					GRANT SUPPORTED
																					OTHER
3.0																					GRANT SUPPORTED
																					OTHER
4.0																					GRANT SUPPORTED
																					OTHER
5.0																					GRANT SUPPORTED
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6.0																					GRANT SUPPORTED
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8.0																					GRANT SUPPORTED
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9.0																					GRANT SUPPORTED
																					OTHER
10.0																					GRANT SUPPORTED
																					OTHER
01																					GRANT SUPPORTED
02			TOTAL →																		OTHER
03																					

OE FORM 9047, 7/77

Figure 5. OE Form 9047
(Table 3. Report of Project Graduates for Academic Year)

SECTION A - BUDGET CATEGORIES

PROJECT COMPONENT(S)	DEGREE PROGRAM(S), NON DEGREE OR CERTIFICATION PROGRAM(S), OTHER COMPONENT(S) (For these project components sequentially list the sub-components by title)					
	1.	2.	3.	4.	5.	6. TOTAL
Personnel	$	$	$	$	$	$
Fringe Benefits						
Travel						
Equipment						
Supplies						
Contractual						
Student Financial Assistance						
Consultants						
Other						
Total Direct Charges						
Indirect Charges (8% maximum)						
TOTAL	$	$	$	$	$	$

SECTION A EXPLANATIONS

Figure 6. OE Form 9047
(Section A. Budget Categories)

SECTION B - BUDGET SUMMARY

PROJECT COMPONENT(S)	ESTIMATED UNOBLIGATED FUNDS		NEW OR REVISED BUDGET		
	FEDERAL (a)	NON-FEDERAL (b)	FEDERAL (c)	NON-FEDERAL (d)	TOTAL (e)
Degree Program(s)	$	$	$	$	$
Non Degree or Certification Program(s)					
Other Component(s)					
TOTAL	$	$	$	$	$

SECTION C - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

PROJECT COMPONENT(S)	FUTURE FUNDING PERIODS (Years)			
	FIRST (a)	SECOND (b)	THIRD (c)	TOTAL (d)
Degree Program(s)	$	$	$	$
Non Degree or Certification Program(s)				
Other Component(s)				
TOTAL	$	$	$	$

Figure 7. OE Form 9047
(Section B. Budget Summary)

TABLE 11
Regional Civil Rights Directors

	FTS Phone	Non-FTS Phone
REGION I—*Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont*		
Mr. John G. Bynoe Regional Director Office for Civil Rights, Region I Dept. of Health, Educ., and Welfare 140 Federal Street Boston, MA 02110	8-223-6397	617-223-6397
REGION II—*New Jersey, New York, Puerto Rico, Virgin Islands*		
Mr. William Valentine Acting, Regional Director Office for Civil Rights, Region II Dept. of Health, Educ., and Welfare 26 Federal Plaza—Room 3908 New York, NY 10007	8-264-4633	212-264-4633
REGION III—*Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, W. Virginia*		
Mr. Dewey E. Dodds Regional Director Office for Civil Rights, Region III Dept. of Health, Educ., and Welfare Gateway Building, 3535 Market Street Post Office Box 13716 Philadelphia, PA 19101	8-596-6772	215-596-6772
REGION IV—*Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee*		
Mr. William H. Thomas Regional Director Office for Civil Rights, Region IV Dept. of Health, Educ., and Welfare 680 W. Peachtree Street, N.W. Atlanta, GA 30308	8-257-3312	404-881-3312
REGION V—*Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin*		
Mr. Kenneth A. Mines Regional Director Office for Civil Rights, Region V Department of Health, Educ., and Welfare 300 South Wacker Drive Chicago, IL 60606	8-353-2520	312-353-2521
Cleveland Office Office for Civil Rights Dept. of Health, Educ., and Welfare Plaza Nine Building 55 Erieview Plaza—Room 222 Cleveland, OH 44114	8-293-4970	216-522-4970
REGION VI—*Arkansas, Louisiana, New Mexico, Oklahoma, Texas*		
Ms. Dorothy D. Stuck Regional Director Office for Civil Rights, Region VI Dept. of Health, Educ., and Welfare 1200 Main Tower Building Dallas, TX 75202	8-729-3951	214-655-3951

TABLE 11 (*Continued*)

	FTS Phone	Non-FTS Phone
REGION VII—*Iowa, Kansas, Missouri, Nebraska*		
Mr. Taylor D. August Regional Director Office for Civil Rights, Region VII Dept. of Health, Educ., and Welfare Twelve Grand Building 1150 Grand Avenue Kansas City, MO 64106	8-758-2474	816-374-2474
REGION VIII—*Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming*		
Dr. Gilbert D. Roman Regional Director Office for Civil Rights, Region VIII Dept. of Health, Educ., and Welfare Federal Building 1961 Stout Street—Room 11037 Denver, CO 80294	8-327-2025	303-837-2025
REGION IX—*Arizona, California, Hawaii, Nevada, Guam, Trust Territory of Pacific Islands, American Samoa*		
Mr. Floyd L. Pierce Regional Director Office for Civil Rights, Region IX Dept. of Health, Educ., and Welfare 100 Van Ness Avenue—14th Floor San Francisco, CA 94102	8-556-8586	415-556-8586
REGION X—*Alaska, Idaho, Oregon, Washington*		
Ms. Marlaina Kiner Regional Director Office for Civil Rights, Region X Dept. of Health, Educ., and Welfare 1321 Second Avenue—Room 5041 MS/508 Seattle, WA 98101	8-399-0473	206-442-0473

Chapter 8

RESPONSES FROM THE PROFESSION

At each of the regional meetings that generated the information in this volume, three reactors represented the audience of professionals involved in personnel preparation. These individuals made notes on the proceedings, were available to individuals for comment and discussion, and held informal conversations. As receivers of information, they were also sensitive to underlying concerns and issues. At the conclusion of each regional meeting, each group of three reactors presented a summation of the conference and of the ideas and concerns they had derived in their interactions with attendees. This chapter presents those concluding comments.

JOSEPH T. GILMORE
New York State Education Department, Albany, New York

OUR KEY problem is the implementation of Public Law 94-142; this pervades all of our training efforts. The Bureau of Education for the Handicapped needs to hear from the field the recurring issues of greatest concern and, in turn, the Bureau should share all of this information with the field. We need to maintain a dialogue on the processes, problems, and prospects of implementing the law.

If we ourselves are not advocates for the handicapped, their situation and our own will be quite tragic.

We have to solve the problems and keep them solved, for the sake of those children out there. We must continue to raise our own consciousness and to implement in reality all of the things implied by the Education of All Handicapped Children Act and by Section 504 of the Rehabilitation Act. If we ourselves are not advocates for the handicapped, their situation and our own will be quite tragic.

Many people tend to use the statutes and regulations as a club, to talk too much about sanctions and too little about collaboration—but collaboration is absolutely necessary if we are to meet the challenges of the complex forces of change that are upon us. The spirit generated must be one of understanding, acceptance, and commitment. We are only at the tip of the iceberg. As we proceed more intensely with intelligent, sensitive, and generous cooperation in the implementation of the law, a number of other needs will surface.

There is obviously a need to continue providing massive inservice training on the individualized educational program, and to clarify its timing and frequency and a host of related issues. Parents and advocate groups are going to want far more in terms of the individualized program, teachers and teachers' unions are going to want far less, and there will be contractual and accountability considerations in collective bargaining.

The provision for the least restrictive environment is also problematic. Many parents and handicapped students themselves have anxieties about this provision and its meaning, focusing on the counterproductivity that may occur if children are placed in situations for which they are ill suited.

The comprehensive system of personnel development is a complex undertaking that is most pertinent to people involved in training. The success of

The success of the comprehensive system of personnel development will depend on a real commitment that college and university people, in particular, would be well advised to make.

this effort will depend on a real commitment that college and university people, in particular, would be well advised to make. Moreover, in light of the difficulties in decision-making authority experienced by many manpower planning committees, these state groups should be able to use VI-D funds or become part of state grant applications so that there may be means of organizing, disseminating information, and gathering the kinds of data that are needed. We need awareness and leadership on the question of teacher surpluses and on the perceptions that Congressmen and others have of this issue. When the National Education Association states that we are training to 200 percent of need, this information receives media and newspaper coverage, and it becomes more difficult for federal agencies to receive appropriations and for us to continue training.

We must become more broad-based and more realistically oriented.

Finally, the emphasis on inservice training is inescapable. When we consider how many different people and complex situations our teachers will have to deal with, it is obvious that a great deal of inservice education is also necessary for our own staff people and for trainers of teachers. It has been suggested that we trainers, as a group, have sometimes had a very narrow focus. The implication is that we must become more broad-based in our views and more realistically oriented.

The Division of Personnel Preparation is making an effort to establish a two-way forum with the field. I hope that we as professionals can match that effort with our own collaborative ideas, solutions, and support. In our various programs across the nation, there is much we can do to contribute to the total picture, to identify the greatest problems, and to assist with the most appropriate solutions.

REUBEN ALTMAN
Department of Special Education, University of Missouri, Columbia, Missouri

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Leadership in certain states is not sufficient to implement comprehensive manpower planning or an encompassing system of personnel development.

THERE IS clearly an evolution of thought and an expressed ability to change within the Bureau of Education for the Handicapped, in terms of procedures, long-term planning, and current priorities. While this evolutionary process is well received, a pervasive concern remains as to the degree of discrepancy between priorities established and communicated to us by the Bureau and the reality needs that exist in our states. For example, the declining emphasis on general special education is not compatible with the needs of many rural states where general special education is still a very high priority. In fact, many people wish to see an increasing focus on the particular problems of rural training programs—in staffing, in recruiting students, and in delivering services to children.

Contradictions are also apparent in actualizing the comprehensive system of manpower planning and personnel development that is to be built into training grants. Within individual states represented at this meeting, the feeling conveyed is that leadership in certain states is not sufficient to implement comprehensive manpower planning or an encompassing system of personnel development. Even in cases where efforts are made and ongoing meetings take place, the necessary follow-through is not seen as forthcoming.

A third major question has to do with the Bureau's emphasis on evaluation, in the absence of funding that would make it possible to carry out the kinds of evaluation that are required. As designs and data collections become more and more sophisticated, they will require additional personnel and resources, and, while we know that we want this kind of quality control, there are real questions about how to pay for it.

Finally, we have concerns about grantsmanship. Just as the Division of Personnel Preparation is endeavoring here to meet our needs for factual information, its personnel should also communicate what might be called "psychological impact information." Suppose, for instance, that a training program is staffed largely with part-time personnel because these happen to be the available people with the greatest expertise. When this part-time faculty is described in a program assistance grant application, is it perceived by reviewers and project officers as a selection of the best possible people or as a patchwork program? Questions of this sort are subtle, but they are on people's minds and need to be dealt with.

The Division of Personnel Preparation should communicate what might be called "psychological impact information."

Also related to grantsmanship is our distress over the short time interval between notification of funding and the date when continuation proposals are due. When a new program is just getting off the ground, it is not realistic nor feasible to supply the kinds of progress reports and data that will support its second-year application. In addition, there are requests for more specific information on the amounts of money available, or guidelines on what maximum amounts a program might request. Last, needs are expressed for more clarification of the various forms and documents that must be submitted to the Bureau, in addition to the explanations covered in the application packet.

While some of these questions may appear to be criticisms, the excellence of the intent of this meeting and the way it was conducted has been repeatedly expressed. Ideally, such meetings would be held earlier in the year so as to provide more lead time for proposal writing. However, an important need for annual ongoing communication is being met, and continuation of these meetings should be well supported by the training field at large.

CYNTHIA GILLES
Director, Special Education Manpower Project
Massachusetts Department of Education, Boston, Massachusetts

FROM A state education agency perspective, this meeting has touched on a number of important points. States are receiving mixed messages and need more clarification of directives. For example, no specified range of acceptable parameters for a comprehensive system of personnel development has been established, and state education agencies need guidelines on those things that are absolutely required and on the options and alternatives that are available to allow for the uniqueness of individual states. The relationship between state VI-D proposals and the total comprehensive system of personnel development also remains unclear. Ideally, the comprehensive system should provide for a creative balancing of training resources (personnel, programs, materials, funds) from multiple sources to respond to identified state needs and priorities, as well as to needs that are regional or national in scope.

On some occasions, state education agencies are expected to exhibit the clout that will enforce Public Law 94-142, while, on other occasions, emphasis rests on the cooperative nature of planning and implementation.

Another area of concern is the variance between requirements of the federal law and regulations, as compared with state law and state regulations. We must also deal with the discrepancy between the cost of mandated programs and the additional funds that are actually available to support them. Moreover, when we talk about heavy funding for special education training of regular education personnel, we become involved in redefining existing roles and changing the positions of many educators. Finally, we are faced with a somewhat contradictory philosophical view of the comprehensive system of personnel development—that is, on some occasions state education agencies are expected to exhibit the clout that will enforce Public Law 94-142, while, on other occasions, emphasis rests on the cooperative nature of planning and implementation.

States have the responsibility of coordinating rapid and very extensive change processes that affect all of education. This job is complicated by competition between special education and regular education for funds, and by political battles between different agencies and organizations. The lack of specificity in defining populations to be trained further complicates matters. There are questions about who should be included under certain kinds of grants (e.g., regular education inservice), questions about what is excluded as well as included in terms of coverage under certain kinds of funding—and we look to the Bureau of Education for the Handicapped for assistance in these areas.

We need to provide options and different approaches to inservice training because, at a state level, we are dealing with so many different sorts of training institutions and delivery systems.

Inservice also requires greater definition. What is the range of models to be considered? What ultimate duration of inservice training can be offered to or required of people who are employed full time? We need to provide options and different approaches to inservice because, at a state level, we are dealing with so many different sorts of training institutions and delivery systems. In our state, we have gradually evolved a type of inservice training which is a blend of preservice and traditional inservice training. This "long-term" inservice program prepares currently employed personnel for new roles and credentials.

Today we can include in training everyone from parents to hearing officers to staffs of state education agencies and college faculties.

Another problem area is that of determining the total range of populations to be trained or retrained. This means mapping the total training system and planning for a much broader range of personnel than we were considering a few years ago. Today we can include everyone from parents to hearing officers to staffs of other state agencies and college faculties. Considerable variation exists across and within these groups in terms of levels and intensity of training needs. In addition, many special educators may have been trained for narrow roles that are now being broadened. Just to map a total system of needs for preservice and inservice training is a major problem for state education agencies and, of course, they are responsible for providing that information to colleges, universities, and the Bureau of Education for the Handicapped.

To develop a system of personnel development, we certainly must provide opportunities for a variety of professional representatives to participate in the planning process. Providing an opportunity, however, is not the same as actually involving the people. Various states are experiencing numerous problems in getting a cooperative planning system off the ground, even though they may be doing all the right things. Institutions of higher education are being asked to respond to substantial unmet needs for new personnel and to steadily increasing demands to deliver inservice training. They must be provided with accurate information on manpower and training needs in order to make the most efficient allocation of their limited resources. Getting accurate information

on the manpower/needs balance can be quite difficult, particularly when this information must be gathered on a regional or national level, and here again Bureau assistance is needed.

In terms of immediate needs, state people want more opportunities to share their problems and their problem-solving strategies, their innovative programs and their established and well designed programs. They want to find out what is going on across state lines, and they want technical assistance. State people also want creative strategies that will help them to coordinate their efforts with those of other public agencies. Although it may appear fairly straightforward in regulations, it is no easy matter for a state department to begin supervising a department of mental health. This interagency concern ties in with the need for more collaboration to produce interdisciplinary training at a school district level, between departments and institutions and between public and private resources. We need new models for interagency collaboration and interdisciplinary training, as well as methods for redesigning existing training programs.

State people want more opportunities to share their problems and their problem-solving strategies, their innovative programs and their established and well designed programs.

Public schools and other public and private agencies also have concerns that are being discovered by university and state personnel. First of all, public school people want some options in developing inservice programs. They do not want a standard package delivered on a statewide basis without variation; they feel that they, too, have needs for individualization. Second, some public school systems would prefer to design training programs using resources other than the university. The message here is that colleges and universities are becoming the sellers in a buyer's market, and the buyers are increasing in the public schools.

Public school people want some options in developing inservice programs.

A very positive step is the fact that the Division of Personnel Preparation and the Division of Assistance to States will be working more and more closely together in the future. That is highly desirable and, coupled with the maximum collaboration and communication from all trainers in the field, can perhaps lead to the kinds of clarification, definition, and substantive assistance that state departments of education need to resolve these difficulties and conflicting demands.

EDWARD J. KELLY
Chairman, Department of Special Education
University of Nevada, Las Vegas, Nevada

PUBLIC LAW 94-142 is broadly viewed as a money bill or a civil rights act, depending on one's frame of reference. While we university people tend to view this law as a civil rights act, we have not yet addressed the specifics of our own commitments to the implementation of this law.

We will, for example, pursue much more P.L. 94-142 related inservice activities with local school districts. At the same time, we may also find ourselves in adversary roles relevant to P. L. 94-142 with these very districts. How shall we easily pursue these diverse roles? Our grant applications often stress the leadership roles we effect in our service regions. How shall our leadership be perceived if the same local districts we purport to lead should fail to comply with Public Law 94-142?

If we are not in the future to be funded as total programs, then who will provide the services that we traditionally have offered?

In addition to this question, the western states have always had specific concerns that stem from their uniqueness. With the exception of states like Texas and California, most of us represent large geographic regions which contain scattered university programs. Most of these programs have functioned quite literally as the "only game in town" for perhaps 250 miles in any direction. To date we have always been funded as total programs, not as a collection of discrete preservice and inservice activities. If we are not in the future to be funded as total programs, then who will provide the services that we traditionally have offered?

This question is extremely critical in view of the growing emphasis on inservice training, because many of our preservice programs have developed from inservice programs. Many of us began single-person programs in specific areas, evolving new programs in response to local interest shown in new program ideas exposed in special inservice workshops, etc. We have had, for this reason, a commonly heavier reliance upon inservice activities than many eastern schools. As the Division of Personnel Preparation moves into heavy support of inservice training, therefore, we must ask, "what are you going to do about already established western state full-service programs that have always counted on their inservice programs without federal funding?". We do this in Nevada, conducting 15 to 20 workshops and special conferences each year, which have never been federally funded and which have been at minimal cost and maximal impact. From our perspective, therefore, the dollar amounts requested for new inservice proposals should be viewed very critically because what we now do for $3,000 may be priced at $30,000 by another program. Obviously this is one question that should be resolved when the various review panels are convened.

What about full-service programs that carry on inservice without federal funding?

The western states are also unique in that they have developed programs very slowly and, in many cases, have dealt with unusual program variables in remote regions. While we now feel that BEH staff better appreciate the scope of our western training problems, we still feel that one never really comprehends the immensity of the region we serve, nor the unusual problems we face in providing service to it, until one gets the feel of the region (or better yet, attempts to drive around its parameters). To reiterate a crucial point, western programs are more likely to be full-service programs, not just clusters of neatly divided discrete inservice and preservice activities. Proper proposal evaluation must therefore take into account such critical regional differences and needs.

We also need to examine the mix between inservice and preservice components. They should not be combined in a comprehensive program assistance grant application, for these activities are simply not the same. Perhaps a new set of application guidelines specific to inservice activities is now in order.

It is not possible to be awarded funds for a slick proposal written by a person without expertise in special education and without a sense of commitment to the profession and the children we serve.

Finally, we attended this meeting largely because we want to discover new wrinkles germane to proposal writing. We all now know that the day of "grantsmanship" in special education is dead. It is not possible to be awarded funds for a slick proposal written by a person without expertise in special education and without a sense of commitment to the profession and the children we serve. Nor is it true that field readers spend a minimal time reviewing each proposal. Having been a panel member and reader, I know the many hours that are spent in this process. These are refereed grants, similar to articles submitted to scholarly journals with their own professional review boards. What we all seek is more information on different ways of structuring

proposals, of unifying them with a coherent philosophy and set of operational rationales for each program subcomponent. Most critically we need to know more about program evaluation. Obviously there is no one correct way to evaluate programs. As proposal writers we need to know a variety of alternative models which enable us not only to collect and report our data, but also to use such data to improve our programs from year to year.

While we look to the Bureau for some of these answers, we must also look to ourselves—to our sense of commitment to making both our programs and our profession more effective.

JASPER HARRIS
Department of Special Education, University of Kansas, Lawrence, Kansas

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THE PEOPLE at the Division of Personnel Preparation do not have all the answers, although they do understand many of the questions. I believe that the Division is making a sincere and imploring effort to ask us in the field to help with the refinement of the regulations for the Education of All Handicapped Children Act. In responding, we also pose a series of questions.

A central question involves how dollar amounts are attached to priorities. Because different regions have different concerns, setting aside universal amounts for specific priorities has been a matter of concern for many people. In the past, universities and other training agencies have responded to Bureau priorities, but, now that the focus in shifting from mild to severe handicaps, what is to be done about maintaining the former staff and hiring new staff members?

Now that the focus is shifting from mild to severe handicaps, what is to be done about maintaining the former staff and hiring new staff members?

Another question involves comprehensive programs. Considering the present priorities and the fact that many bloc grants across the country are scheduled for reduction by half, one wonders whether the Bureau is no longer interested in comprehensive programming.

Finally, some questions are pertinent to the process of grant application and award. People ask whether the approval of a convened panel in the review process leads in all cases to Bureau approval of the application. There is also an expressed need for more standardization and harmony between grant guidelines and grant evaluation sheets, as it is difficult to address evaluation components and meet grant guidelines simultaneously.

These concerns, as voiced here by participants in this meeting, are legitimate issues that we will face in our own environments for months or years. Many of us feel that the adjustments that need to be made in the regulations for Public Law 94-142 are substantive in nature and explanatory. Our desire is both clarity of language and a definitive posture.

GEORGE M. OLSHIN
Southern Connecticut State College, New Haven, Connecticut

We must participate fully at the college level in the development and review of manpower planning.

THE FOCUS of personnel preparation is clearly on the practical, rather than on the theoretical or Ivy League traditional. The people at the Division of Personnel Preparation have always emphasized the need for hands-on experience among faculty members, and the importance of practice for trainees. But now our need to get things done in terms of P.L. 94-142 makes practical realities all the more important.

A number of things will require patience because they will not happen overnight. There is concern that a definition of social maladjustment is not included in the regulations. We should recall that it took the American Association on Mental Deficiency 20 years to develop their definition, and there is still disagreement on it.

We were also reminded that we must participate fully, at the college level, in the development and review of manpower planning, and that will be a long-term process, as will our response to Sections 502, 503, and 504 of the Rehabilitation Act. At our college, we were a little embarrassed because, after having been in the special education area for over 15 years, we finally last year got the curbs cut and some ramps installed. It simply took all that time for our administration and for the state to get the money to get the job done, and, even then, it was in response to a pressure group of students and faculty members.

We also need to deal with the cutbacks in some federal funding, and have to re-examine our allocations for training and for stipend payments. The five different programs of student support mentioned earlier have considerable money, and we should at least explore them, rather than writing stipends arbitrarily into proposals. We should look into them, too, in order to attract the right students.

As the supply of funds grows smaller, the quality of programs we propose will no doubt increase.

As the supply of funds decreases, the quality of programs we propose will no doubt increase. When 1400 applications are received and 700 are awarded funds, it is clear that there is much competition for grants. The recipients, in the final analysis, will be those who have been able to mesh Public Law 94-142 into their programs and to develop ways to carry out thrust-relevant activities. To help us in these areas, the Bureau has done some highly creative things in terms of the Missouri manpower planning project, the New Mexico dissemination project, and the Virginia evaluation project, as well as other projects that can help us. Becoming involved in these activities and services will enhance our abilities to plan and execute our own programs, and thereby to serve handicapped students and other professionals with increasing effectiveness.

JERRIE UEBERLE
Arizona Department of Education, Division of Special Education, Phoenix, Arizona

THIS CONFERENCE was my inservice. There has been great value for me in receiving this information, hearing these ideas, talking with fellow professionals, and being able to attach faces to names. There has been a good clarification of the changes that are necessary in light of Public Law 94-142 and the changes that have occurred within the Division of Personnel Preparation. Moreover, the honesty and integrity with which questions were answered has been remarkable. I congratulate the Division of Personnel Preparation for its support to us in the field as we move toward developing a comprehensive system of personnel preparation.

A number of points could be made as a result of this meeting, but the one I want to express concerns the use of VI-D funds. We have heard repeatedly that these monies are discretionary and highly competitive. Therefore, if we are awarded VI-D funds, they are in reality the frosting on the cake—special funds to do special things. In order to decide about the frosting, we must first know about the cake. Educational inservice dollars are already available and are being spent in every state. Is what's happening the best we can do? Is this what we need to continue? Do these programs represent answers to our present needs? Or do they represent what we have done year after year? Perhaps new money—additional money—is not what will make the difference. Perhaps we must first look at our present use of existing funds to determine what the "cake" is before considering the need for frosting. The VI-D funds are intended for the development of exemplary programs that will help to implement Public Law 94-142. That should be the intent of everything we do. All programs must address that as their target concern. Programs that do not address exemplary practices that assist in the implementation of delivering services to all handicapped children should not be continued. Our basic programs, the existing systems, should be reacting to the changes in legislation and the new needs in the field. The response should be awareness of what we are doing—and what we need to enhance with additional funds.

If our existing training efforts are not making a difference, we must identify and do those things that will, not with new monies, but with existing monies. We cannot be dependent on VI-D discretionary funds to remediate shortcomings in our basic systems. We must restructure our basic system and create a cake worth frosting, rather than lots of frosting and no cake.

The VI-D funds are intended for the development of exemplary programs that will help to implement Public Law 94-142, but that should also be the target of everything else we do.

Perhaps we must first look at our present use of existing funds to determine what the "cake" is before considering the need for frosting.

DIANE D. BRICKER
Mailman Center for Child Development, University of Miami, Florida

We must work together, find ways to look at the pie, divide it, and carry out activities in a more efficacious manner.

AS A means for communication between the Bureau of Education for the Handicapped and the people in the field who are doing what needs to be done, this kind of dialogue should be continued and enhanced. In fact, it behooves all of us to find methods of meeting among ourselves more often and to open up lines of communication. We are trying to tackle enormous and complex problems, and any mechanism that will increase understanding about what is going on in the field and in Washington should lead us to better resolutions of the real and serious issues we are confronting.

This meeting has provided practical assistance in completing grant applications and understanding time lines, and has thus saved time for us in the field and for the Bureau. On a less pragmatic level, this meeting has helped to focus on some major issues, and has illuminated some of the work that will bring solutions to these issues. One message BEH seems to be sending is that we must work together, find ways to look at the pie, divide it, and carry out activities in a more efficacious manner. For a long time, we were accustomed to having sufficient funds to develop and implement projects independent of each other. What we now face is a different and very tough reality. Limited funds are requiring the development of strategies for coordinating and cooperating. Meetings like this could be a springboard or an augmentation of these efforts, particularly if their content were expanded. On the one hand, it is necessary to understand procedures and policies that pertain to grant applications. On the other hand, it is even more important to have mutual understandings about the *content* of applications and the *content* of the field.

One substantial area we should explore is the best use of finite resources.

One substantial area we should explore is the best use of finite resources. The truth is that there is not enough money to do all that needs to be done. I work with young children who are severely handicapped. The cost of providing appropriate service programs for this population is staggering, and yet we should be finding strategies to generate and support early intervention programs for all handicapped children. One potential solution is to pool our resources at a local, state, and regional level, and then determine how to most effectively use those resources we have.

Difficulties also exist in terms of evaluation procedures, which are easier to develop than to implement. Although we know many of the variables that apparently make a difference in our programs, to our trainees, and for children, we lack good instruments for measuring the effect of variables objectively. In many instances, we are not looking for short-term, but for long-term, outcomes. We need to follow our trainees for three years after graduation, not just three months, but often we do not have the resources to do the necessary kind of tracking and much other important data gathering.

The growing relationships among institutions of higher education, state education agencies, and local education agencies, and those between state and local education agencies, compose another key area of concern. A productive relationship is considerably more than obtaining a letter of support from the state department. Real communication and sharing require work, and the willingness to compromise. We all need strategies for developing these relationships and maintaining them productively.

The regulations for Section 504 of the Rehabilitation Act and for Public Law 94-142 have given us new standards, and people tend to interpret some of these regulations and standards from a relatively unbending perspective. A better point of view might be caution as to how we rattle the public's cage. We who work with exceptional individuals often forget that we are a minority group working with yet another minority group. Although rapid changes may be possible on a superficial level, it is altogether different to change attitudes. Perhaps we should think in terms of successive approximations, rather than ultimatums. Pushing and forcing may not always achieve what we want to accomplish in the long run. Patience, careful planning, and cooperation may be our best means for assisting the handicapped individual in obtaining his lawful rights.

We who work with exceptional individuals often forget that we are a minority group working with yet another minority group.

LAWRENCE W. MARRS
Chairman, Department of Special Education,
Murray State University, Murray, Kentucky

INTERFACE, INTERACTION, and infusion are three words that might characterize the essence of this meeting. There is change in the Bureau of Education for the Handicapped, which is beginning to function as a change agent in the field of special education in relation to institutions of higher education, state education agencies, and local school districts. The people at this conference are ready to participate in this change.

The possibility of relating to the field through interactions among colleges, universities, state departments, and local school districts seems to be the future direction of personnel development in special education. Although we have had this option for creative development for some time, we have only recently seen emphasis on this approach. The fact that the laws and regulations are pointing to this forces us to make these needed changes in the educational enterprise. Thus, there is a need for systemic change and for change agents to lead the whole effort, and there is a potential for each of us to act as change agents. If we can see Public Law 94-142 and other mandates as resources and can communicate them to others as resources, we will have done a great service.

The Division of Personnel Preparation is now developing a proactive stance, not just a reactive strategy. This is reflected in its organizational changes and its willingness to participate with programs in the field. One analysis of the success of this conference has been the idea that it could be a large, open-ended discussion, providing long-term leadership for systemic change. The people here are interested and excited about this kind of change, and look to the Bureau of Education for the Handicapped to provide continued leadership.

If we can see Public Law 94-142 and other mandates as resources and can communicate them to others as resources, we will have done a great service.

CONCLUSION: PARTNERSHIP FOR CHANGE

JASPER HARVEY
Director

HERMAN SAETTLER
PHILIP J. BURKE
PAUL ACKERMAN
Branch Chiefs

Division of Personnel Preparation
Bureau of Education for the Handicapped

A FEDERAL agency should serve its constituents. The Division of Personnel Preparation exists to serve all agencies that train personnel in the vital and humane process of educating children with handicaps. Given all the variables, limited federal funds, overburdened and understaffed training agencies, and necessary paperwork, how can this Division help you? Expressed as a philosophy, how can we become partners?

The Division of Personnel Preparation exists to serve all agencies that train personnel in the vital and humane process of educating children with handicaps.

1. Participate in establishing priorities. The matter of priorities is one area in which federal concerns sometimes appear to differ from your concerns. Federal funding priorities are based on significant needs for training, determined by Public Law 94-142 and on needs that arise in the field. These priorities are identified in a manner that is quite painstaking. Note the following sources of information for determining priorities, and ask yourself how your voice may be heard through them:

- The Congressional hearing;
- The Congressional intent as expressed in the conference report accompanying the legislative packet;
- The *Congressional Record* of both the Senate and the House;
- Joint conference reports on legislation and appropriations;
- State plans;
- State legislation;
- Institutions of higher education application data;
- Professional organizations;
- General Accounting Office studies and audits;
- National Center of Educational Statistics studies;
- National Education Association studies;
- Professional judgment of the BEH staff;
- U. S. Office of Education general counsel interpretations of the law and the intent of Congress;
- Budget review testimony of the Office of Education, Assistant Secretary, and Office of Management and Budget levels. . . .[47,48]

The direction of dollars may continually shift in order to provide for various needs for personnel that are surfacing in critical categories, but our major

responsibility is to the training of personnel who will educate Public Law 94-142's first priorities—the unserved and the most severely handicapped. Some areas of the country are experiencing massive difficulties in terms of training and retraining to comply with the law. Thus, when proposals are received from such high-need locations, our overriding concern will be the extent to which they show promise of responding to the greatest training demands in their service areas.

Different sections of the country manifest great dissimilarity in the way training has evolved, in the extent to which preservice trainers have related to inservice needs, in the availability and use of resources, and in the current status of programs.

Some of you, however, will find that federal priorities do not coincide neatly with the priorities that directly influence you—priorities of geography, state plans, or training institutions. Different sections of the country manifest great dissimilarity in the ways training has evolved, in the extent to which preservice trainers have related to inservice needs, in the availability and use of resources, and in the current status of programs. Hopefully, the new regional emphasis within the Division will assist in reconciling regional priorities with mandated national requirements. Even though state manpower planning committees are charged with assisting in the solution of statewide personnel development needs, more planning and action will have to be undertaken—by you—to provide the common answer to three major questions posed in chapter 8. You will have to find more general special education dollars to prepare personnel to serve the mildly handicapped. You must determine how you can retain long-time staff members while, at the same time, employing new personnel to implement new priority areas. You should question and remedy the problems related to the relative strengths and weaknesses of training programs staffed with part-time faculties.

A strong general special education base is vital to the substance and growth of training programs, and many training agencies have already provided for this in an enduring manner.

2. Recruit a competent academic/clinical faculty. The answer to all of these questions rests on the necessity of developing a critical mass of full-time personnel whose salaries are paid by university monies, rather than by temporary federal funds. For a number of years, the Bureau of Education for the Handicapped spent large amounts of money to underwrite training programs in general special education. Training institutions have had considerable lead time to transfer this core of general special education personnel to university money, and to use federal grants for the development of *new* programs. In no sense is the importance of a strong general special education base to be minimized. Such a core is vital to the substance and growth of training programs, and many training agencies have already provided for this in an enduring manner. For them, it is not at all impossible to provide adequate training for teachers of the mildly and moderately handicapped and, at the same time, rely on Part D monies to meet priorities established by Public Law 94-142.

The same planning must apply to the question of staffing of programs with part-time personnel. To ensure quality, a program must have a core of full-time faculty and staff; without full-time people, no program can achieve enrichment or expansion, no matter how highly qualified its part-time personnel might be. There must be commitment to student selection and advisement, research, leadership, supervision of internships and practica, as well as collaboration with public schools, communities, and state agencies. The fragmentation of part-time staffing does not facilitate the achievement of these necessary goals, although part-time faculty members can contribute significantly within the established matrix and dependable continuity of the core staff.

Planning should also help training institutions to combine both inservice and preservice programming into a single proposal. If the two are separated,

reasonable teaching loads become more difficult to establish and an atmosphere of part-time effort can easily prevail. In supplying manpower to serve all handicapped children, inservice and preservice training, as well as a full-capacity faculty, should be parallel commitments.

3. Achieve full collaboration among state and local education agencies and institutions of higher education. The state education agency oversees all state educational services and is faced with a variety of people who need training, as well as numerous requirements for service delivery. These demands are forcing the state education agency to change its entire role structure and, subsequently, to experience the duality of parity and power. On the one hand, the state plan for comprehensive personnel development should involve the state department in collaboration with all people concerned with preparation. On the other hand, because the state has ultimate responsibility, it will have to exercise its power to set comprehensive plans in motion.

The state education agency is being forced to change its entire role structure and, subsequently, to experience the duality of parity and power.

The new kinds of relationships now required between state education agency people and providers of training are, in many senses, fragile. While there are many opportunities for a large group of professionals to become engaged in planning for personnel development, successful collaboration will depend in large measure on the personal commitment of those who become involved. There is an absolute need for trust among all of those now involved in training; competitive interactions or "stonewalling" must be eliminated. People must reach certain levels of understanding—and then productivity.

4. Plan for inservice training. Regular educators must be trained to teach exceptional children in their classrooms. The existing special education teaching force must be upgraded and updated, and a large number of support personnel must be trained. Inservice programming must take on an unbelievably broad scope in order that all children may receive the most appropriate education in the least restrictive environment. That least restrictive environment for each child grows out of his individualized educational program, and all personnel related to that child and to that program must understand that the processes required by Public Law 94-142 are part of a continuum whose bottom line is a free, appropriate public education for that child and for all others.

Inservice programming must take on an unbelievably broad scope in order that all children may receive an appropriate education in the least restrictive environment.

Now that your part of our partnership is defined, it is time to clarify the role of the Division of Personnel Preparation, a role best described as that of facilitator. How do we work, and what are our responsibilities?

Many people want to know about the Division's internal work schedule. Technical and professional evaluation and processing of 1400 proposals starts in October and extends until June, and the pressure to complete the entire process within that time frame is great. We also begin in December of the previous year to prepare application forms, obtain package approval, determine and clear closing dates, and attend to many other details pertinent to applications. Our schedule does not dovetail with the demands made on training programs, but Tables 12 and 13 show the pace of our activities for the current year and just how compressed they are.

Curiosity about individual award amounts is also evident. Our average grant is $60,000, and the range is generally between $10,000 and $340,000. It is impossible to advise applicants as to the amounts for which they should apply; program developers are the single best judges of program costs. On the other

hand, all applications cannot be funded at the levels they request because financial resources are severely limited.

Outright approvals of applications, without any concerns, are a rarity.

In the review and approval process, panels, project officers, and the Division Director read proposals and make recommendations about approval, disapproval, modifications, and so on. The Deputy Commissioner signs off on these recommendations, as his own final decision to the Grant and Procurement Management Division, which processes the award. Although changes in recommendation may occur at each level, substantial and specific documentation and reconciliation must accompany every change. Outright approvals of applications, without any concerns, are a rarity but, even when this occurs, funding level considerations enter the picture.

Simply addressing needs is not enough; plans must also be made to show whether needs are being met, as documented in measurable, positive changes in trainees, children, service delivery.

Applications have to contain adequate justification of the *need* for training and the *need* for funds, and must describe procedures for evaluating program effectiveness. An application that only addresses needs is not sufficient; plans must also be made to show whether needs are being *met*, and whether the applicant is documenting positive changes in trainees, children, and/or service delivery.

Your questions regarding evaluation reflect mutual anxieties about ensuring that programs work. Evaluation costs money. Thus, five to ten percent of each grant budget should be allocated to this component. The problem, however, is more than an issue of money and personnel allocation. It is compounded by the current lack of instrumentation for gathering data on personnel preparation. Missing are proven means for long-term evaluation and follow-up of trainees. This kind of tracking is important, not only for evaluation and modification of training, but also for determining the extent of and reasons for our attrition rates. A central issue is "burn-out," particularly in personnel working with severely handicapped children. We need to understand what happens to these people who have been so painstakingly trained, and then arrange career continuation to renew them and keep them in the profession.

We are absolutely concerned that Public Law 94-142 is implemented, and we ask that trainers make the extra effort that will be necessary to see that this is accomplished.

The Division of Personnel Preparation is very serious about finding solutions and creating programs that will guarantee the rights of the handicapped as defined in Section 504 of the Rehabilitation Act and in Public Law 94-142. We also realize that total compliance with the spirit of the law will not happen overnight. It will take many people acting in good faith and expending extraordinary effort. It will also require the leadership that will develop as professionals are required to stretch, to be creative, and to use all of their capacities.

The potential for change resides in all individuals, and change can be renewal. Although the requirements of Public Law 94-142 may, in some quarters, represent an onus, they can also be seen as a challenging set of possibilities. There is care throughout the nation about doing the right things for children. We want to help with this, and we want to do so with a sense of partnership with the people who are really carrying out these changes—you. If you cannot see us as a part of you and yourselves as a part of us, we will not be able to accomplish what we are setting out to do.

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TABLE 12
Schedule for Processing New Grant Applications, FY 77–78
Division of Personnel Preparation

Activity	Deadline
Program application form prepared and sent to Support Operations Branch, Grant Procurement and Mgmt Division	March 31, 1977
Closing date determined	March 31
Application package reviewed/approved by Support Operations Branch and sent to Forms Design	June 15
Qualified field readers identified	July 1
Application mailing list established and validated	July 20
Closing date cleared with Grant Procurement and Mgmt Division, Office of General Counsel, Office of Education Regulations Officer, Office of Education Commissioner	July 31
Closing date published	August 4
Mailing list completed by Grant Procurement and Mgmt Division (ongoing)	August 9
Application package prepared by Forms Design; printed by Government Printing Office (contract)	August 10
Conflicts clarified	August 10
Applications distributed and mailed by Grant Procurement and Mgmt Division	August 12
Prior year evaluation procedures reviewed	August 15
Regional meetings	September 7–16
Regulations for coming fiscal year reviewed and adopted	September 10
Technical review plan prepared	September 20
List of committed field and convened panelists established (includes qualified reviewers)	October 1
Closing date	October 14
Applications distributed and mailed by the Division of Personnel Preparation (continuous)	October 14
List transmitted to Grant Procurement Mgmt Division	October 14
Applications received by Application Control Center	October 14
Program log established by Application Control Center	October 20
Applications received by Division of Personnel Preparation	October 23
Division of Personnel Preparation corrects B-2 listing (continuous)	October 23–June 30
Applications and program control log delivered to program by Application Control Center	October 28
Applications screened by Division of Personnel Preparation	November 5
Review and initial assignment to Project Officers by Branch Chiefs	November 8
Preliminary review by Project Officers	November 20
Proposals assigned	November 20
Field readers and convened panels established	December 1
Review package mailed	December 10
Completed reviews of new packages received	January 10, 1978
Panels convened for three weeks, beginning	January 16
Project Officer evaluation	February 20
Reconciliation and funding reconciliation	February 20
Branch review, recommendations, and reconciliation	March 15
Division review, recommendations, and reconciliation	March 31
Paneling procedures repeated, if necessary	March 31
Awards list prepared for responsible official	April 13
Prefunding review	April 13
Further reconciliations: Branch and Division as directed	April 13
Award list forwarded to Grant Procurement & Mgmt Division	April 13
Negotiation letters prepared and sent	May 10
Replies received and verified	May 19
Official files forwarded and sent to Grant Procurement and Management Division	June 1

TABLE 13
Schedule for Processing Continuation Grant Applications, FY 77–78
Division of Personnel Preparation

Activity	Deadline
Program application form prepared and sent to Support Operations Branch, Grant Procurement and Mgmt Division	March 31, 1977
Closing date determined	March 31
Application package reviewed/approved by Support Operations Branch and sent to Forms Design	June 15
Qualified field readers identified	July 1
Application mailing list established and validated	July 20
Closing date cleared with Grant Procurement and Mgmt Division, Office of General Counsel, Office of Education Regulations Officer, Office of Education Commissioner	July 31
Closing date published	August 4
Mailing list completed by Grant Procurement and Mgmt Division (ongoing)	August 9
Application package prepared by Forms Design; printed by Government Printing Office (contract)	August 10
Conflicts clarified	August 10
Applications distributed and mailed by Grant Procurement and Mgmt Division	August 12
Prior year evaluation procedures reviewed	August 15
Regional meetings	September 7–16
Regulations for coming fiscal year reviewed and adopted	September 10
Technical review plan prepared	September 20
List of committed field and convened panelists established (includes qualified reviewers)	October 1
Closing date	October 14
List transmitted to Grant Procurement Mgmt Division	October 14
Applications distributed and mailed by the Division of Personnel Preparation (continuous)	October 14
Applications received by Application Control Center	October 14
Program log established by Application Control Center	October 20
Applications received by Division of Personnel Preparation	October 20
Applications and program control log delivered to program by Application Control Center	October 28
Applications screened by Division of Personnel Preparation	November 20
Branch review and assignment	December 10
Progress reviewed by Project Officer	December 10
Decision to panel	December 10
If panel, proposals assigned and new awards format followed	December 10
If no panel, recommendation for funding by Project Officer	February 15, 1978
Branch review, recommendations, and reconciliation	February 15
Division review, recommendations, and reconciliation	March 1
Budget amounts targeted	March 5
Pre-funding review	March 10
Awards list; official files to Grant Procurement Mgmt Division	April 1

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